

EXHIBIT D

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF NEW JERSEY

3 - - -

4 IN RE: JOHNSON & : MDL No.
5 JOHNSON TALCUM POWDER : 16-2738
6 PRODUCTS MARKETING, : (MAS)(RES)
7 SALES PRACTICES, AND :
8 PRODUCTS LIABILITY :
9 LITIGATION :
10 :

11 SUPERIOR COURT OF NEW JERSEY
12 LAW DIVISION, ATLANTIC COUNTY

13 - - -

14 IN RE: TALC-BASED : Consolidated
15 POWDER PRODUCTS : Docket No.
16 LITIGATION : ATL-L-2648-15
17 :
18 : MCL Case No.
19 : 300
20 :

21 - - -

22 January 10, 2024

23 - - -

24 Remote Oral Expert
deposition of JUDITH KAY WOLF, M.D.,
conducted at the location of the witness
in Austin, Texas, commencing at 10:15
a.m. Eastern, on the above date, before
Kimberly A. Cahill, a Federally Approved
Registered Merit Reporter, Certified
Court Reporter, and Notary Public.

 - - -

 GOLKOW TECHNOLOGIES, INC.
877.370.3377 ph| 917.591.5672
deps@golkow.com

Page 2	Page 4
Page 3	Page 5
<p>1 APPEARANCES:</p> <p>2</p> <p>3 BEASLEY ALLEN</p> <p>4 BY: P. LEIGH O'DELL, ESQUIRE</p> <p>5 BY: MARGARET M. THOMPSON, ESQUIRE</p> <p>6 218 Commerce Street</p> <p>7 Montgomery, Alabama 36104</p> <p>8 (334) 269-2343</p> <p>9 leigh.odell@beasleyallen.com</p> <p>10 margaret.thompson@beasleyallen.com</p> <p>11 Representing the Plaintiffs</p> <p>12</p> <p>13 ASHCRAFT & GEREL</p> <p>14 BY: MICHELLE A. PARFITT, ESQUIRE</p> <p>15 1825 K Street NW</p> <p>16 Suite 700</p> <p>17 Washington, D.C. 20006</p> <p>18 (202) 335-2600</p> <p>19 Representing the Plaintiffs</p> <p>20</p> <p>21 GOLOMB LEGAL</p> <p>22 BY: RICHARD M. GOLOMB, ESQUIRE</p> <p>23 1835 Market Street</p> <p>24 Suite 2900</p> <p>Philadelphia, Pennsylvania 19013</p> <p>(215) 985-9177</p> <p>Representing the Plaintiffs</p> <p>SHOOK, HARDY & BACON LLP</p> <p>BY: MARK C. HEGARTY, ESQUIRE</p> <p>2555 Grand Boulevard</p> <p>Kansas City, Missouri 64108</p> <p>(816) 474-6550</p> <p>mhegarty@shb.com</p> <p>Representing the Defendants, Johnson & Johnson and Johnson & Johnson Consumer, Inc.</p> <p>- - -</p>	<p>1 August to December</p> <p>2 2023</p> <p>3 Wolf-5 Curriculum Vitae of 116</p> <p>4 Judith K. Wolf,</p> <p>5 M.D.</p> <p>6 Wolf-6 Notice of Oral 119</p> <p>7 Deposition of</p> <p>8 Judith E. Wolf,</p> <p>9 M.D. and Dukes</p> <p>10 Tecum in MDL</p> <p>11 Wolf-7 11/15/23 Second 124</p> <p>12 Amended Rule 26</p> <p>13 General Expert</p> <p>14 Report of Judith</p> <p>15 Wolf, M.D.</p> <p>16 Wolf-8 11/15/23 Amended 125</p> <p>17 Rule 26 Bondurant</p> <p>18 Case-Specific</p> <p>19 Expert Report of</p> <p>20 Judith Wolf, M.D.</p> <p>21 Wolf-9 11/15/23 Amended 127</p> <p>22 Rule 26 Judkins</p> <p>23 Case-Specific</p> <p>24 Expert Report of</p> <p>Judith Wolf, M.D.</p> <p>Wolf-10 11/15/23 Amended 128</p> <p>Rule 26 Gallardo</p> <p>Case-Specific</p> <p>Expert Report of</p> <p>Judith Wolf, M.D.</p> <p>Wolf-11 "Effects of Risk 142</p> <p>Factors for ovarian</p> <p>cancer in women</p> <p>with and without</p> <p>endometriosis</p> <p>Paper by Phung, et</p> <p>al</p> <p>Wolf-12 "Genital Powder Use 167</p> <p>and Risk of</p>
<p>1 - - -</p> <p>2 I N D E X</p> <p>3 - - -</p> <p>4</p> <p>5 Testimony of: JUDITH KAY WOLF, M.D.</p> <p>6 By Mr. Hegarty 25</p> <p>7 By Ms. O'Dell 275</p> <p>8 By Mr. Hegarty 285</p> <p>9 - - -</p> <p>10 E X H I B I T S</p> <p>11 - - -</p> <p>12 NO. DESCRIPTION PAGE</p> <p>13</p> <p>14 Wolf-1 Materials 71</p> <p>15 Considered List</p> <p>16 Attached as Exhibit</p> <p>17 B to the 11/15/23</p> <p>18 2nd Amended Export</p> <p>19 Report (General) of</p> <p>20 Judith Wolf, M.D.</p> <p>21 Wolf-2 "Folder #2 General 80</p> <p>22 Causation</p> <p>23 Materials, Lynch</p> <p>24 Systematic Review</p> <p>Tables</p> <p>Wolf-3 Thirty-four Pages 107</p> <p>of Judith Wolf</p> <p>Invoices Starting</p> <p>with January 2017</p> <p>Wolf-4 Three Pages of 110</p> <p>Judith Wolf</p> <p>Invoices from</p>	<p>1 Epithelial Ovarian</p> <p>2 Cancer in the</p> <p>3 Ovarian Cancer in</p> <p>4 Women of African</p> <p>5 Ancestry</p> <p>6 Consortium" Paper</p> <p>7 by Davis, et al</p> <p>8 Wolf-13 "Association 192</p> <p>9 Between the</p> <p>10 Frequent Use of</p> <p>11 Perineal Talcum</p> <p>12 Powder Products and</p> <p>13 Ovarian Cancer: a</p> <p>14 Systematic Review</p> <p>15 and Meta-analysis</p> <p>16 Paper by Woolen, et</p> <p>17 al</p> <p>18 Wolf-14 "Asbestos Exposure 206</p> <p>19 and Ovarian Cancer</p> <p>20 A Gynaecological</p> <p>21 Occupational</p> <p>22 Disease</p> <p>23 Background,</p> <p>24 Mandatory</p> <p>Notification,</p> <p>Practical Approach"</p> <p>Paper by Nowak, et</p> <p>al</p> <p>Wolf-15 "The effect of talc 215</p> <p>powders on</p> <p>phagocytes in</p> <p>co-culture with</p> <p>ovarian cancer</p> <p>cells" Paper by</p> <p>Mandarino, et al</p> <p>Wolf-16 "Transcriptomic and 221</p> <p>epigenomic effects</p> <p>of insoluble</p> <p>particles on J774</p> <p>macrophages" Paper</p> <p>by Emi, et al</p> <p>Wolf-17 "Talcum powder 236</p>

Page 6	Page 8
1 induces malignant transformation in normal human primary ovarian epithelial cells 2 3 Paper by Harper, et al 4	1 - - - 2 DEPOSITION SUPPORT INDEX 3 - - - 4
5 Wolf-18 PLOS ONE Reviewer 236 6 Comments 7 SAED SEPT222021_ SUPPLE_000100 8 SAED SEPT222021_ SUPPLE_000104	5 Direction to Witness Not to Answer 6 Page Line Page Line Page Line 7 8 Request for Production of Documents 9 Page Line Page Line Page Line 10 114 6 11
9 Wolf-19 Gynecologic Oncology Reviewer 251 10 Comments 11 SAED SEPT222021_ SUPPLE_000059 and 12 SAED SEPT222021_ SUPPLE_000070	12 Stipulations 13 Page Line Page Line Page Line 14
13 Wolf-20 General Report of Dr. Wolf Present with Witness 266 14	15 Question Marked 16 Page Line Page Line Page Line 17
15 Wolf-21 Judkins Case-Specific Report of Dr. Wolf Present with Witness 267 16	18 19 20 21 22 23 24
17 Wolf-22 Gallardo Case-Specific Report of Dr. Wolf Present with Witness 268 18	
19 Wolf-23 Bondurant Case-Specific Report of Dr. Wolf Present with Witness 268 20	
21 Wolf-24 Dr. Longo's 269 22 23 24	
Page 7	Page 9
1 Exposure Report Present with Witness 2 3 Wolf-25 Dr. Longo's MDL Third Supplemental Report Present with Witness 269 4 5 6 Wolf-26 Dr. Levy's Report Present with Witness 269 7 8 Wolf-27 Entirety of Literature Dr. Wolf Brought to Deposition 270 9 10 Wolf-28 "HHS Public Access and risk of epithelial ovarian cancer in the Women of African Ancestry Consortium" Paper by Davis, et al 280 11 12 13 14 15 16 17 18 19 20 21 22 23 24	1 - - - 2 THE COURT REPORTER: All parties to this deposition are appearing remotely and have agreed to the witness being sworn in remotely. Due to the nature of remote reporting, please pause briefly before speaking to ensure all parties are heard completely. 3 4 5 6 7 8 9 10 Counsel, please state your appearances for the record. 11 12 MS. O'DELL: Leigh O'Dell from Beasley Allen for the plaintiffs. 13 14 MS. THOMPSON: Margaret Thompson from Beasley Allen. 15 16 MS. PARFITT: Michelle Parfitt, Ashcraft & Gerel, for the plaintiffs, MDL steering committee. 17 18 19 20 21 MR. GOLOMB: Richard Golomb from Golomb Legal for the plaintiffs. 22 23 24 MR. HEGARTY: Mark Hegarty

<p style="text-align: right;">Page 10</p> <p>1 for the Johnson & Johnson 2 Defendants. 3 MR. GOLOMB: So this is 4 Richard Golomb from Golomb Legal. 5 I am a member of the plaintiffs' 6 Executive Committee in the 7 multidistrict litigation in front 8 of Judge Shipp in Trenton. I am 9 also the de facto co-lead with Ted 10 Meadow from Beasley Allen in state 11 court in New Jersey in front of 12 Judge Porto. 13 I've had a number of 14 meet-and-confers with Susan 15 Sharko, who, along with Mark 16 Hegarty, represents Johnson & 17 Johnson. 18 What is relevant today is 19 that we have had a number of 20 conversations, e-mail 21 communications, including a 22 meet-and-confer just two nights 23 ago where we discussed 24 coordination between the</p>	<p style="text-align: right;">Page 12</p> <p>1 MDL, whether that was on general 2 causation or specific causation, a 3 deposition in the MCL could be 4 taken for that limited purpose. 5 So I'm attending this 6 deposition with the understanding 7 that there was coordination, and 8 for the first time this morning 9 when I raised the issue off the 10 record, Mr. Hegarty has told me 11 that he -- and he can speak for 12 himself -- that he's communicated 13 with Ms. Sharko and that Ms. 14 Sharko says there is no such 15 agreement. 16 At 10:04 this morning, I 17 sent Ms. Sharko an e-mail and I 18 just wrote: I'm on the Wolf 19 deposition. Is it your position 20 that we do not have a coordination 21 agreement between NJSC, New Jersey 22 State Court, and the MDL? She 23 responded at 10:09: Correct, we 24 do not yet have -- do not yet have</p>
<p style="text-align: right;">Page 11</p> <p>1 multidistrict litigation and the 2 multicounty litigation in state 3 court for these expert depositions 4 beginning with Dr. Wolf today. 5 The agreement that we had in 6 principle, which was -- which was 7 agreed by Ms. Sharko, but she did 8 make clear that was subject to the 9 approval of her client and I had 10 expected to hear from her 11 yesterday -- but the agreement was 12 that to the extent that the 13 general causation expert reports 14 of these experts are, if not -- if 15 not exactly the same, close to 16 being the same, that there would 17 be coordination between the 18 multicounty litigation and the 19 multidistrict litigation for the 20 purposes of these depositions. 21 The further agreement was, 22 to the extent that an expert 23 provided something in the MCL 24 addition -- in addition to the</p>	<p style="text-align: right;">Page 13</p> <p>1 an agreement. And then I 2 responded to that with an e-mail 3 saying: Is that because you don't 4 have approval of your client yet 5 or is this coordination agreement 6 now off the table? And I haven't 7 heard back from her. 8 So that's -- that's my 9 statement for the record. I don't 10 know whether the position of Ms. 11 Sharko at this point is, despite 12 these communications that we had, 13 that she's no longer going to 14 agree or that she just technically 15 hasn't gotten the approval of her 16 client yet. 17 And this is the first -- as 18 far as I know, the first 19 deposition that would be subject 20 to this coordination agreement. 21 MR. HEGARTY: Responding for 22 Johnson & Johnson at this 23 deposition, what Mr. Golomb said 24 with regard to Ms. Sharko's most</p>

<p style="text-align: right;">Page 14</p> <p>1 recent response is what I 2 understand as well, that there is 3 as of yet no agreement between the 4 plaintiffs and the Johnson & 5 Johnson Defendants with regard to 6 coordination of general experts 7 between the MDL and the, as Mr. 8 Golomb said, multicounty New 9 Jersey litigation. 10 My understanding is that 11 that agreement is still under 12 discussion, but is not a -- but is 13 not, as Mr. Golomb just 14 referenced, in place yet. 15 So from our standpoint, that 16 is, the Johnson & Johnson 17 Defendants' standpoint, this 18 deposition of Dr. Wolf is limited 19 just to the MDL for which it was 20 originally noticed and originally 21 agreed upon as far as this date. 22 MR. GOLOMB: I have no 23 response. 24 I'll just note -- I'll just</p>	<p style="text-align: right;">Page 16</p> <p>1 record with regard to the 2 materials considered list or as -- 3 and I guess it is called for Dr. 4 Wolf "Scientific Literature and 5 Other Sources," list provided 6 previously entitled -- I guess it 7 was previously entitled 8 "Scientific Literature and Other 9 Sources." It's now entitled 10 "Materials Considered" -- that was 11 provided on November 15th, 2023 12 and on which I'm prepared to take 13 this deposition about. 14 I think Ms. O'Dell has -- at 15 least Ms. O'Dell's indicated off 16 the record that there are now 17 additional materials to add to 18 that list and for which we have a 19 dispute about with regard to their 20 applicability and as it relates to 21 this deposition. 22 So, Leigh, do you want to 23 state your position and I'll state 24 a response, provide a response?</p>
<p style="text-align: right;">Page 15</p> <p>1 note for the record that I did 2 provide the MCL caption to the 3 court reporter and at least for 4 now -- and hopefully going 5 forward, we'll reach an agreement, 6 but at least for now, the MCL 7 caption will be part of the 8 deposition transcript. 9 MR. HEGARTY: And at least 10 for now, to use Mr. Golomb's 11 phrase, we would object, that is, 12 the Johnson & Johnson Defendants 13 object, to inclusion of that 14 additional caption. 15 As Mr. Golomb said, perhaps 16 if there is an agreement, it will 17 refer back to today's deposition; 18 but at least as of today, as of 19 now, we object to, again, this 20 deposition being in the New Jersey 21 litigation and having the New 22 Jersey caption. 23 I believe we also have an 24 issue that we want to put on the</p>	<p style="text-align: right;">Page 17</p> <p>1 MS. O'DELL: Yes. I will 2 state briefly that plaintiffs 3 provided materials for Dr. Wolf in 4 advance. There were materials 5 that were not available at the 6 time her report was served in 7 November of 2023, namely Dr. 8 Longo's report on the exposure 9 analysis of plaintiffs, bellwether 10 plaintiffs, in the MDL, as well as 11 his November 17th MDL third 12 supplemental report, and also Dr. 13 Levy's report. 14 And I've made counsel for 15 Johnson & Johnson aware that Dr. 16 Wolf has reviewed those materials, 17 she's prepared to answer questions 18 on those today. We alerted them 19 in advance of the deposition. 20 Those are the only 21 additional materials and they've 22 been in the possession of 23 defendants for more than -- nearly 24 60 days.</p>

Page 18

1 So our position is we go
 2 forward today, that the deposition
 3 will be completed, will not be
 4 held open, which is the request
 5 that counsel for Johnson & Johnson
 6 has made.
 7 So that's the position I
 8 would take this morning. We're
 9 happy to meet and confer about
 10 that further, but considering the
 11 hour, you know, I would just say
 12 let's leave these disputes to be
 13 resolved later and continue with
 14 the deposition.
 15 MR. HEGARTY: For the
 16 Johnson & Johnson Defendants, I
 17 note that the Special Master
 18 opinion and order number 6 from
 19 July 30th, 2021 noted or required
 20 that -- or ordered that plaintiffs
 21 and defendants shall produce at
 22 least three days before their
 23 experts' depositions all documents
 24 considered by the experts in

Page 19

1 forming their opinions, as well as
 2 all documents requested in the
 3 applicable notices of deposition.
 4 The three reports that Ms.
 5 O'Dell referenced, Dr. Longo's
 6 exposure report of November 17,
 7 2023, Dr. Longo's third
 8 supplemental report of November
 9 17, 2023, and Dr. Levy's report of
 10 November 2023, were not disclosed
 11 to the Johnson & Johnson
 12 Defendants or their counsel three
 13 days in advance of the deposition
 14 and, in fact, the materials that
 15 we were provided included some
 16 reports and other materials, but
 17 none of the three that we are --
 18 that I just referenced.
 19 We were first provided
 20 notice of which of those reports
 21 that Dr. Wolf had reviewed this
 22 morning. We did get an e-mail
 23 yesterday of a reference to Dr.
 24 Levy having reviewed Dr. Longo's

Page 20

1 reports, without a reference to
 2 what specific reports that was in
 3 relation to. There was a -- also
 4 a comment or statement about
 5 providing an updated or amended
 6 materials considered list
 7 yesterday that was not provided.
 8 It's still not been provided.
 9 The materials that we're
 10 talking about do pertain to three
 11 of the plaintiffs for which Dr.
 12 Wolf has case-specific opinions
 13 about. Neither I nor any other
 14 counsel to my knowledge for
 15 Johnson & Johnson certainly have
 16 reviewed those materials for
 17 purposes of today's deposition and
 18 I'm certainly not prepared to go
 19 forward and question Dr. Wolf
 20 about reports for which I have not
 21 reviewed or even seen.
 22 So we would object to any
 23 contention that this deposition in
 24 the time we have today is limited

Page 21

1 -- would include those materials,
 2 that we would have to spend our
 3 time on those materials, which we
 4 again did not receive notice of
 5 until this morning.
 6 So subject to that, we are
 7 prepared to go forward on the
 8 remain -- on what we have received
 9 notice about and what we are to
 10 prepared to discover -- what are
 11 prepared to discuss with Dr. Wolf,
 12 but certainly not those three
 13 reports.
 14 MS. O'DELL: Mr. Hegarty, we
 15 agree to disagree and -- but I
 16 would just -- it's 9:30 and Dr.
 17 Wolf has been waiting, so I would
 18 ask that you proceed with the
 19 deposition and we'll, off the
 20 record with the assistance of, I'm
 21 sure, Judge Schneider, will try to
 22 resolve this issue.
 23 MR. HEGARTY: Yes. And I
 24 just want to make it clear, if I

<p style="text-align: right;">Page 22</p> <p>1 haven't already, that we do object 2 to limiting this to any assertion 3 that we're required to cover those 4 three reports at today's 5 deposition and do intend to leave 6 this deposition open subject to 7 further discussions and ultimately 8 ruling by the Court as far as what 9 should have been done and what 10 should be done with regard to Dr. 11 Wolf's testimony as it relates to 12 those three additional reports. 13 With that, I'm ready to go 14 forward. 15 MS. O'DELL: Well, let me 16 say one more thing in response to 17 that: Number one, Judge Schneider 18 has not issued an order in 19 relation to these depositions and 20 I think we need to make that 21 clear. It was not an applicable 22 order for these depositions. The 23 Federal Rules require that you 24 produce the materials at the</p>	<p style="text-align: right;">Page 24</p> <p>1 Wolf for that same period of time. 2 Counsel for plaintiffs also had 3 the opportunity to provide us 4 notice over the last 60 days of 5 her review of those materials and 6 that notice came this morning, so 7 I just want to make that clear as 8 well. 9 We're obviously not going to 10 reach an agreement or resolution 11 right now, but I do agree with Ms. 12 O'Dell that we should go forward 13 and take this issue up after the 14 deposition. 15 MS. PARFITT: Mr. Hegarty, 16 it's 10:31 -- this is Michelle 17 Parfitt -- just to make sure 18 you're aware, we've advised the 19 court reporter that at 10:50 20 Eastern, we have to adjourn 21 temporarily for purposes of the 22 Singh hearing, so I just -- 23 MR. HEGARTY: Yeah, thanks, 24 Michelle. I got that. I</p>
<p style="text-align: right;">Page 23</p> <p>1 deposition. We've done that in 2 advance as a professional 3 courtesy. We gave notice 4 yesterday. These reports were in 5 Johnson & Johnson's possession, as 6 I've mentioned, for nearly 60 7 days. 8 I would say further, the 9 order limits these depositions to 10 four hours; and to the degree you 11 wish to examine Dr. Wolf on these 12 additional materials, then you 13 should reserve time for that. If 14 you choose not to ask questions 15 today about those materials, you 16 should reserve the requisite time. 17 There will not be additional time 18 for that. 19 MR. HEGARTY: Thanks, Leigh. 20 My last comment is that with 21 regard to those reports being 22 available to the Johnson & Johnson 23 Defendants for now over 60 days, 24 they were also available to Dr.</p>	<p style="text-align: right;">Page 25</p> <p>1 understand it. So just in 20 2 minutes, I guess -- is that 20 3 minutes -- just let us know and 4 we'll take a break. 5 MS. PARFITT: Got it. 6 MR. HEGARTY: With that, we 7 can now go ahead and swear in Dr. 8 Wolf. 9 - - - 10 JUDITH KAY WOLF, M.D., after 11 having been duly sworn, was 12 examined and testified as follows: 13 - - - 14 EXAMINATION 15 - - - 16 BY MR. HEGARTY: 17 Q. Good morning, Dr. Wolf. 18 A. Good morning. 19 Q. Would you please tell us 20 your name? 21 A. Judith Kay Wolf. 22 Q. Dr. Wolf, my name is Mark 23 Hegarty and I represent the Johnson & 24 Johnson Defendants in this case. We're</p>

Page 26

1 here today for your deposition in the In
 2 Re: Johnson & Johnson Talcum Powder
 3 Products Marketing, Sales Practices, and
 4 Products Liability Litigation, and in
 5 particular, we're here today to discuss
 6 your recent amended reports in the MDL
 7 and determine if any of your opinions
 8 have changed and are new since September
 9 2021, when you were last deposed.
 10 Do you understand that
 11 generally?
 12 A. Yes.
 13 Q. We are also here today to
 14 determine if you intend to refer to any
 15 additional literature or materials that
 16 were not identified as of when you were
 17 last deposed and testified at your MDL
 18 deposition back in September 2021.
 19 Do you understand that as
 20 well?
 21 A. Yes.
 22 Q. Are you prepared today to
 23 discuss the latest amendments to your MDL
 24 report, as well as any changed or new

Page 27

1 opinions that you have?
 2 A. Yes.
 3 Q. And are you prepared today
 4 to identify any additional literature or
 5 materials as support for your opinions
 6 that were not identified as of your last
 7 deposition in September 2021?
 8 A. Yes.
 9 Q. Dr. Wolf, from where are you
 10 testifying today?
 11 A. Austin, Texas.
 12 Q. Where are you in Austin
 13 right now?
 14 A. I am sitting in the kitchen
 15 of Margaret Thompson.
 16 Q. At Margaret Thompson's home?
 17 A. At her home.
 18 Q. Is anyone with you in that
 19 room?
 20 A. Yes. In the room are
 21 Margaret Thompson and Leigh O'Dell.
 22 Q. Did you bring any materials
 23 with you to the deposition today, that
 24 is, materials of which you have a hard

Page 28

1 copy of or electronic copy of?
 2 A. Yes. I have, to my left
 3 here I'm looking, my reports and all of
 4 my literature reviewed, considered, and
 5 the new literature that was reviewed,
 6 whether it was included or not in my
 7 report.
 8 Q. When you say you have all
 9 your reports, are you talking about your
 10 amended -- let me start over again --
 11 with regard to all your reports, are you
 12 talking about your November 15, 2023
 13 general amended report in the MDL?
 14 A. Yes, as well as the specific
 15 reports for the three plaintiffs.
 16 Q. And those three plaintiffs
 17 are Ms. Gallardo, Ms. Judkins, and Ms.
 18 Bondurant?
 19 A. That's correct.
 20 Q. You have physical copies of
 21 those reports with you?
 22 A. I do.
 23 Q. You also mentioned that you
 24 have all of the literature reviewed and

Page 29

1 considered. Does that mean you have
 2 physical copies of all the articles on
 3 your materials considered list with you?
 4 A. I do.
 5 Q. Other than the four reports
 6 and the hard copies of all the materials
 7 considered, the literature and other
 8 materials on your materials considered
 9 list, do you have any other documents
 10 with you today?
 11 A. I do have hard copies of the
 12 other three documents, the Longo amended
 13 report, the Longo exposure report, and
 14 Dr. Levy's report, and that is all, a
 15 glass of water.
 16 Q. What are the dates of those
 17 three reports?
 18 A. The two reports from Dr.
 19 Longo are dated November 17th, 2023 and
 20 Dr. Levy's report is dated November 15th,
 21 2023.
 22 Q. When did you receive those
 23 reports?
 24 A. Sometime after they were

Page 30

1 completed. I don't remember the date.
 2 Q. Are you able to recall
 3 approximately how long ago from today you
 4 received them?
 5 A. This is January 10th, so I
 6 believe sometime in late November or
 7 December.
 8 Q. When did you review them in
 9 relation to receiving them?
 10 A. Sometime after I received
 11 them, before -- before January 1st.
 12 Q. How much time did you spend
 13 reviewing each of the reports, if you can
 14 break it down by report?
 15 A. I don't recall specifically.
 16 Probably one to two hours per report.
 17 Q. Do you intend to rely on any
 18 of those reports for purposes of your
 19 opinions in this case?
 20 A. Those reports, in my
 21 opinion, affirm my opinions and support
 22 my opinions. I'm not sure if that's what
 23 you're asking.
 24 Q. Let me ask it in a different

Page 31

1 way: Do you anticipate when you're on
 2 the stand and talking about your opinions
 3 in this case, including your opinions
 4 specific to Ms. Judkins, Ms. Galardo, and
 5 Ms. Bondurant, specifically referencing
 6 anything in those three reports as --
 7 A. Yes.
 8 Q. -- it relates to your
 9 opinions?
 10 A. Yes.
 11 Q. So you would specifically
 12 cite to those three reports in talking
 13 about your opinions generally and your
 14 opinions as to the three plaintiffs I
 15 just mentioned.
 16 A. I would talk about them as
 17 they affirm my own opinion and support my
 18 opinion for each of the three plaintiffs.
 19 Q. And with regard to your
 20 testimony about those three reports,
 21 we're going to look at here in a little
 22 bit your four November 2023 amended
 23 reports. And in those reports, you set
 24 out the substance of your testimony and

Page 32

1 you make references to particular studies
 2 and other materials that you rely upon.
 3 Do you recall doing that in
 4 those reports?
 5 MS. O'DELL: Object to the
 6 form.
 7 THE WITNESS: Yes -- I'm
 8 sorry. I hesitated because I
 9 wasn't sure if I was supposed to
 10 answer, but yes.
 11 BY MR. HEGARTY:
 12 Q. Okay. Do you anticipate
 13 further amending those four reports to
 14 specifically cite to Dr. Longo's November
 15 2023 reports and Dr. Levy's 2023 report?
 16 A. No.
 17 Q. Do you have any plans to
 18 amend your report to add anything
 19 additional to them as they stand now?
 20 A. At this point, no, unless
 21 some other literature is published or
 22 something else that I come across that
 23 supports my opinion that I think would be
 24 important to include that is not already

Page 33

1 in my current report.
 2 Q. Did you make a specific
 3 request to plaintiffs' counsel for the
 4 Longo and Levy reports from 2023?
 5 A. I don't recall.
 6 Q. Do you recall how you came
 7 to receive them?
 8 A. I'm sure the plaintiffs'
 9 attorneys provided them to me.
 10 Q. Prior to you receiving those
 11 reports, had you reviewed any other
 12 reports by Dr. Longo and Dr. Levy?
 13 A. Not by Dr. Levy. I had
 14 reviewed Dr. Longo's previous reports.
 15 Q. You'd reviewed his previous
 16 report, but those were not -- those
 17 reports were not included in your
 18 materials considered list. Are you aware
 19 of that?
 20 MS. O'DELL: Objection to
 21 the form.
 22 THE WITNESS: I'm sorry.
 23 I'm not aware of that.
 24 BY MR. HEGARTY:

Page 34

1 Q. Do you recall including any
 2 of Dr. Longo's reports in the -- in
 3 Exhibit B to your MDL reports?
 4 MS. O'DELL: If you need to
 5 look at Exhibit B, Dr. Wolf, feel
 6 free to do that.
 7 THE WITNESS: Yeah, let me
 8 look at that. Sorry. Give me a
 9 minute.
 10 MR. HEGARTY: Before you
 11 look at that, Dr. Wolf, can I ask
 12 you another question?
 13 BY MR. HEGARTY:
 14 Q. With regard to the three
 15 reports we're talking about, do you
 16 intend to add them to your materials
 17 considered list?
 18 A. Yes.
 19 Q. Have you prepared an amended
 20 materials considered list yet?
 21 A. No.
 22 MR. HEGARTY: When we take a
 23 break for this call we have coming
 24 up, Dr. Wolf, we can -- we can

Page 35

1 then go back to the question I
 2 left outstanding as whether Dr.
 3 Longo's report is on your
 4 materials considered list, that
 5 is, any of them. I would like to
 6 go ahead and move on, if that's
 7 all right with you?
 8 THE WITNESS: Yes.
 9 BY MR. HEGARTY:
 10 Q. Have we now covered all the
 11 materials that you have -- I'm sorry. Go
 12 ahead.
 13 MS. O'DELL: Excuse, Mark,
 14 just for a moment. Dr. Wolf was
 15 asked about Exhibit B and you made
 16 representations about what was not
 17 on there. Dr. Wolf has not had
 18 the opportunity to look at Exhibit
 19 B to respond to your question.
 20 And so I know we're going to
 21 take a break in a few minutes.
 22 When that happens, I would request
 23 that you give Dr. Wolf the
 24 opportunity to respond to that

Page 36

1 question after she's had
 2 opportunity to look at Exhibit B.
 3 MR. HEGARTY: I'm going to
 4 go ahead and withdraw the question
 5 for now and we'll circle back to
 6 it to the extent that I want to.
 7 MS. O'DELL: I will just
 8 represent -- I think you've
 9 overlooked Dr. Longo's reports on
 10 her Exhibit B. And so maybe
 11 during the break, you'll take a
 12 look at item 193 and there are a
 13 couple of other references as
 14 well.
 15 MR. HEGARTY: Okay. Thank
 16 you.
 17 BY MR. HEGARTY:
 18 Q. Have we covered now, Dr.
 19 Wolf, all of the materials that you have
 20 with you at the deposition today?
 21 A. Yes.
 22 Q. Have you prepared any notes
 23 or other materials for this case since
 24 your last deposition in September 2021

Page 37

1 besides your amended reports, the
 2 materials considered list, and the list
 3 of your testimonies --
 4 A. No.
 5 Q. -- your prior testimony?
 6 A. No.
 7 Q. As I mentioned, you were
 8 last deposed in the MDL in September
 9 2021. Have you gone back and reviewed
 10 that testimony prior to today?
 11 A. Yes.
 12 Q. Was there any testimony from
 13 that deposition you thought was
 14 inaccurate or needed to be changed?
 15 A. No.
 16 Q. Have you reviewed any of
 17 your other testimony in any talcum powder
 18 case since September 2021?
 19 A. I believe I reviewed the
 20 very first deposition for the MDL, which
 21 was 2018, 2019?
 22 Q. Was there any testimony you
 23 recall thinking that was inaccurate or
 24 that you wanted to change from your

Page 38

1 review of that deposition?

2 A. No.

3 Q. Has there been any change in

4 your employment status since September

5 2021?

6 A. Not -- not since September

7 of 2021, no.

8 Q. Are you still working full

9 time?

10 A. No, I'm working part-time as

11 a locums tenens provider, so multiple

12 places around the country that need help,

13 two to three weeks per month. And I was

14 doing that in September of '21, also.

15 Q. Have you worked in 2024?

16 A. No, not yet.

17 Q. Do you have plans to -- do

18 you have specific plans already to work

19 in 2024?

20 A. Yes.

21 Q. What specific plans do you

22 have?

23 A. So between January and June

24 of 2024, I'll be working 12 days a month

Page 39

1 in Billings, Montana and then I also have

2 several weeks between that time period

3 where I'll be working in Green Bay,

4 Wisconsin.

5 I haven't solidified my work

6 plans the second half of 2024 yet.

7 Q. Where will you be working in

8 Billings, Montana?

9 A. The Billings Clinic.

10 Q. When does that start?

11 A. January 21st.

12 Q. Where will you be working in

13 Green Bay?

14 A. Bellin Hospital.

15 Q. Is that work through

16 ComHealth?

17 A. CompHealth, yes.

18 Q. CompHealth.

19 A. Yes.

20 Q. What facilities did you work

21 at in 2022?

22 A. 2022, I worked at Hershey

23 Medical Center in Hershey, Pennsylvania.

24 I worked at Goshen Cancer Center -- or

Page 40

1 Goshen Center for Cancer Care in Goshen,

2 Indiana. I believe I might have worked

3 at Community Health in Indianapolis one

4 or two weeks in 2022.

5 I think that's it.

6 Q. Where did you work in 2023?

7 A. I was still working in

8 Hershey -- at Hershey Medical Center in

9 Hershey, Pennsylvania. I worked in

10 Community Hospital in Indianapolis

11 several weeks. I worked in Park Nicollet

12 Hospital in Minneapolis, Minnesota and in

13 Bellin Hospital in Green Bay, Wisconsin

14 and one week at the Billings Clinic in

15 Montana.

16 Q. Approximately how many weeks

17 in the year of 2022 did you work at those

18 -- at the facilities you listed?

19 A. Probably about 30 to 35

20 weeks.

21 Q. Same question as to 2023:

22 How many weeks did you work that year?

23 A. Probably about the same.

24 Q. Do you recall the names of

Page 41

1 any of the physicians that you reported

2 to or were your supervisors in 2022 and

3 2023?

4 A. I'm thinking. Many of the

5 places where I'm working, there isn't

6 really anyone I'm reporting to, because

7 they need a gynecologic oncologist, so

8 I'm not given a particular physician that

9 I'm reporting to.

10 At Goshen Center for Cancer

11 Care, there was a medical -- or a

12 surgical oncologist, first name was

13 Henry -- I can't remember his last

14 name -- who was the head of the cancer

15 center. And I only worked at Billings

16 for one week and I met the head of the

17 cancer center, but I don't remember his

18 name.

19 At the other places, there

20 wasn't anyone I was particularly pointed

21 to that I was reporting to.

22 Q. At the facilities you listed

23 for 2022 and 2023, were you working there

24 as a gynecologic oncologist?

Page 42

1 A. Yes.

2 Q. And did you perform

3 surgeries at those facilities in 2022 and

4 2023?

5 A. Yes.

6 Q. Approximately how many

7 surgeries did you perform on a monthly

8 basis in 2022 and 2023?

9 A. Probably 10 to 12 surgeries

10 per month.

11 Q. Generally, what types of

12 surgeries did you perform with regard to

13 those 10 to 12 per month?

14 A. Laparoscopic hysterectomies

15 and staging surgeries, exploratory

16 laparotomies with hysterectomies and

17 cytoreduction, vulvar surgeries, vaginal

18 surgeries, occasionally an operation on a

19 bowel if it was involved with the cancer.

20 Q. Apart from surgeries, what

21 types of conditions -- what types of

22 conditions have you been treating since

23 September 2021?

24 A. Ovarian cancer, uterine

Page 43

1 cancers including endometrial cancer and

2 other types of uterine cancers like

3 sarcoma, both benign and malignant

4 ovarian masses, vulvar cancers, cervical

5 cancers, vaginal cancers, and preinvasive

6 diseases of the cervix, vagina, and

7 vulva.

8 MS. O'DELL: Mark, excuse

9 me. We're at 9:50 and, as we've

10 previously agreed, request we go

11 off the record so we can attend

12 the hearing before Judge Singh.

13 MR. HEGARTY: Let's go ahead

14 and go off the record.

15 - - -

16 (A discussion off the record

17 occurred.)

18 - - -

19 (A recess was taken from

20 10:52 a.m. to 11:43 a.m.)

21 MR. HEGARTY: We're back on

22 the record.

23 BY MR. HEGARTY:

24 Q. Dr. Wolf, when we left off,

Page 44

1 I asked you about the questions you have

2 been treating since September 2021 and

3 you provided a list of those conditions.

4 What percentage of your work

5 since September 2021 has been caring for

6 patients with ovarian cancer?

7 A. Probably about 20 to 30

8 percent of the time.

9 Q. Has there been any change in

10 the type of care and treatment that you

11 have provided to your ovarian cancer

12 patients since September 2021?

13 A. No. I mean, some of the

14 medications used for medical treatment in

15 chemotherapy, when to use it, has changed

16 slightly, but as a whole, no.

17 Q. Have you done any teaching

18 of other doctors regarding ovarian cancer

19 since September 2021?

20 A. Yes. When I was working at

21 Hershey Medical Center, there was a

22 residency program in obstetrics and

23 gynecology, so part of my duties working

24 there was teaching the residents in

Page 45

1 clinics and in the operating room on

2 ovarian cancer and all the types of

3 patients that I saw.

4 In addition, I have

5 voluntarily given some lectures to a

6 residency program in Oklahoma, don't ask

7 me the name of it, I don't recall. A

8 friend of mine was the residency chair

9 there and they asked me to give a lecture

10 on gynecologic oncology to their

11 residents.

12 Q. And what facility in

13 Oklahoma was that?

14 A. Yeah, I don't remember. It

15 was a community residency program

16 somewhere in Oklahoma. I don't remember

17 the name of it or the city.

18 Q. With regard to your time at

19 Hershey, what percentage of that time was

20 spent discussing with the residents

21 ovarian cancer issues?

22 A. So they were with me when I

23 was taking care of patients, so

24 approximately the same amounts of time

Page 46

1 that I was with ovarian cancer patients,
 2 so 20 to 30 percent of the time.
 3 It was about the specific
 4 patients we were caring for most of the
 5 time, but I would also specifically talk
 6 to them about how common is ovarian
 7 cancer, how we treat it, what the
 8 symptoms are, you know, what the next
 9 steps are outside of the patient's room
 10 just to give them more of an education.
 11 Q. Did any of those discussions
 12 ever extend to the opinions you have in
 13 this case with regard to talc and ovarian
 14 cancer?
 15 A. Not that I recall.
 16 Q. Did you hold any titles in
 17 connection with this teaching
 18 responsibility?
 19 A. No.
 20 Q. Other than treating patients
 21 and being involved in counseling or
 22 treating -- or educating residents, have
 23 you been involved in any other
 24 professional activities since September

Page 47

1 of 2021?
 2 A. No.
 3 Q. Since September of 2021,
 4 have you done any consulting work outside
 5 of litigation consulting?
 6 A. No.
 7 Q. As to litigation, have you
 8 been disclosed as an expert in any type
 9 of case since September of 2021 besides
 10 cases involving talcum powder and ovarian
 11 cancer?
 12 A. No.
 13 Q. Have you been deposed since
 14 September 2021 in any --
 15 A. No.
 16 Q. -- type of case?
 17 A. No.
 18 Q. Have you prepared any videos
 19 on ovarian cancer or other subjects since
 20 September of 2021, including for any law
 21 firm?
 22 A. No.
 23 Q. Have you communicated with
 24 any regulatory agency on any topic since

Page 48

1 September of 2021?
 2 A. No.
 3 Q. Have you submitted anything
 4 or provided any testimony to any
 5 regulatory group or scientific
 6 organization since September 2021?
 7 A. No. I did give a talk at a
 8 medical society called the Felix Rutledge
 9 Society that was on misogyny and sexism
 10 in gynecologic oncology. I don't know if
 11 that is something that you were -- would
 12 include -- be included in what you're
 13 asking about.
 14 Q. Have you attended any
 15 professional organization meetings since
 16 September 2021?
 17 A. Yes, that one that I
 18 mentioned. I think that's the only one
 19 I've attended.
 20 Q. Other than the presentation
 21 you just discussed, have you presented at
 22 any meeting since September 2021?
 23 A. No.
 24 Q. Since September 2021, have

Page 49

1 you drafted any publications where you
 2 referred to talcum powder exposure?
 3 A. No.
 4 Q. Since September of 2021,
 5 have you drafted any publications where
 6 you referred to asbestos exposure and
 7 ovarian cancer?
 8 A. No.
 9 Q. Do you have any works in
 10 progress where there are references to
 11 either talcum powder use or asbestos
 12 exposure?
 13 A. No.
 14 Q. Do you have plans for any
 15 such publications in 2024?
 16 A. No.
 17 Q. When you were deposed at
 18 your first MDL deposition back in January
 19 2019, that's five years ago, you
 20 testified that you did plan to take your
 21 report and write a review paper and
 22 submit it for publication.
 23 Do you recall saying that?
 24 A. I do, but I never did that.

Page 50

1 Q. Do you have any plans to do
 2 so in 2024?
 3 A. No.
 4 Q. Since September 2021, have
 5 you given any formal presentations or
 6 lectures to your peers where you are
 7 standing in front of a group of your
 8 physician colleagues where talcum powder
 9 exposure or use was discussed?
 10 A. No.
 11 Q. Same question as to where
 12 asbestos exposure was discussed.
 13 A. No.
 14 Q. Since September 2021, have
 15 you given any presentations where you
 16 made any reference to fibrous talc, heavy
 17 metals, or fragrances?
 18 A. No.
 19 Q. Since September of 2021,
 20 have you discussed in any setting the
 21 opinions you have here in the MDL with
 22 any of your physician colleagues or
 23 peers?
 24 A. I think in general about my

Page 51

1 opinion that talc is associated with
 2 ovarian cancer, I'm sure I've discussed
 3 that with colleagues, not specifically
 4 about the MDL, but as a risk factor and
 5 something that I -- I affirm is a cause
 6 of ovarian cancer. I don't remember
 7 anything specifically, but I'm sure I've
 8 mentioned it.
 9 Q. Do you recall any colleague
 10 -- any of the names of any colleagues
 11 where you had that discussion?
 12 A. No.
 13 Q. Since September of 2021,
 14 have you discussed any of your opinions
 15 in the MDL with any of your patients?
 16 A. No.
 17 Q. Since September of 2021,
 18 have you changed in any way your
 19 communications with patients or the
 20 information you gather from your patients
 21 regarding talcum powder use?
 22 A. No.
 23 Q. Have you discussed since
 24 September 2021 with any patient talcum

Page 52

1 powder use?
 2 A. Yes.
 3 Q. Have you done so with every
 4 patient, every ovarian cancer or other
 5 patient, you've interacted with or just
 6 certain patients?
 7 A. My recollection is that most
 8 of the ovarian cancer patients, it's
 9 something I discuss. A lot of times the
 10 ovarian cancer patients have brought it
 11 up and asked about it, also, so either I
 12 bring it up or they have.
 13 For the patients that are
 14 not ovarian cancer patients, a few of
 15 them may have asked about it, but I don't
 16 routinely bring it up with a non-ovarian
 17 cancer patient.
 18 Q. When you've had those
 19 discussions, have you identified yourself
 20 to your patients as an expert witness for
 21 plaintiffs in the talcum powder
 22 litigation?
 23 A. Generally, I do, just
 24 because to be transparent with my

Page 53

1 patients.
 2 Q. Do you talk with them about
 3 -- well, let me start over again. When
 4 you've had those discussions, have you
 5 ever provided them with any literature or
 6 reference materials?
 7 A. Not to my recollection.
 8 Q. When you've had those
 9 discussions, have you referred to any
 10 authorities that have an opinion contrary
 11 to you who have made statements that
 12 talcum powder use is not associated with
 13 ovarian cancer?
 14 MS. O'DELL: Object to the
 15 form.
 16 THE WITNESS: Not that I
 17 recall.
 18 BY MR. HEGARTY:
 19 Q. In particular, have you ever
 20 referred any of your patients to the
 21 NCI's PDQ where it discusses talcum
 22 powder use?
 23 A. I haven't referred any of my
 24 patients to the NCI's PDQ for that or

Page 54

1 anything else that I recall.
 2 Q. Since September of 2021,
 3 have you told any patient of yours with
 4 ovarian cancer that their cancer was
 5 caused by their use of talcum powder?
 6 A. No.
 7 Q. Since September of 2021,
 8 have you determined that any patient of
 9 yours' ovarian cancer was caused by their
 10 use of talcum powder?
 11 A. I haven't determined the
 12 cause of any of -- of ovarian cancer of
 13 any of the patients that I've seen since
 14 2021 specifically.
 15 Q. With regard to the
 16 facilities where you've worked since
 17 September 2021, do any of their patient
 18 intake forms ask about talcum powder use?
 19 A. Not that I know of, but I
 20 don't really look at the patient intake
 21 forms. I take my own patient history and
 22 that's part of the chart, but I don't
 23 usually specifically look closely at it.
 24 Q. As part of your taking a

Page 55

1 patient's history since September 2021,
 2 do you always ask about talcum powder
 3 use?
 4 A. For ovarian cancer patients,
 5 most of the time, I do, not all of the
 6 time.
 7 Q. How do you determine when to
 8 ask and when not to ask?
 9 A. I don't have a specific
 10 determination of when I do or when I
 11 don't. I would say, generally, I ask
 12 them all of the questions that might have
 13 a risk -- might be a risk factor for them
 14 getting ovarian cancer, and generally
 15 talc is one of those questions, but I
 16 don't have specific time when I do or I
 17 don't or a reason --
 18 Q. Since September of -- I'm
 19 sorry to interrupt.
 20 A. No, that's all.
 21 Q. Since September of 2021,
 22 have you advised any patient to stop
 23 using talcum powder?
 24 A. Yes.

Page 56

1 Q. When have you advised
 2 patients generally to stop using talcum
 3 powder?
 4 A. Well, certainly if they have
 5 ovarian cancer or come to me and might
 6 have ovarian cancer and have let me know
 7 that they are using it, I ask them to --
 8 tell them to stop.
 9 And then other patients that
 10 don't have ovarian cancer who've asked
 11 about the risk of using talcum powder and
 12 ovarian cancer, even if ovarian cancer is
 13 not their concern for seeing me, I
 14 recommend that they stop.
 15 Q. As a matter of course, as to
 16 patients who do not have ovarian cancer
 17 and don't bring up the issue of talcum
 18 powder use, do you tell the patients to
 19 stop using talcum powder if they are
 20 using it?
 21 A. Yes.
 22 Q. Other than what we have
 23 discussed so far, have you communicated
 24 with anyone outside of plaintiffs'

Page 57

1 counsel in this litigation your opinions
 2 in the MDL since September 2021?
 3 MS. O'DELL: Objection.
 4 THE WITNESS: Not that I
 5 recall.
 6 BY MR. HEGARTY:
 7 Q. Have you communicated with
 8 FDA about your opinions in the MDL since
 9 September 2021?
 10 A. No.
 11 Q. Have you communicated with
 12 any scientific group or body about your
 13 opinions in the MDL since September 2021?
 14 A. No.
 15 Q. Has any regulatory authority
 16 or scientific body reached out to you
 17 about your opinions with regard to talc
 18 and ovarian cancer since September 2021?
 19 A. No.
 20 Q. At your January 2019
 21 deposition, you testified that you
 22 intended to write a letter to SGO with
 23 your concerns about its website not
 24 listing talc as a risk factor for ovarian

Page 58

1 cancer.
 2 Do you recall testifying to
 3 that?
 4 A. I do recall, but I did not
 5 do that.
 6 Q. Do you have any plans to do
 7 so in 2024?
 8 A. No.
 9 Q. Since September 2021, have
 10 you shared your opinions with regard to
 11 talc and ovarian cancer in any written
 12 form other than your reports in the MDL
 13 or in other cases in which you have been
 14 involved?
 15 A. No.
 16 Q. You testified also back in
 17 2019 about communicating your views to
 18 the National Ovarian Cancer Coalition.
 19 Do you recall testifying to that?
 20 A. Yes, I do recall testifying
 21 to that.
 22 Q. Have you had -- conveyed
 23 your views to this coalition since
 24 January of 2019?

Page 59

1 A. I can't remember the date.
 2 It may have been -- yeah, well, it's
 3 certainly after January 2019 that I did
 4 at a meeting discuss with their board my
 5 opinions about talc and ovarian cancer.
 6 Q. Did you say that was in
 7 January of 2022?
 8 A. I don't remember. It was
 9 after January of 2019 and I don't recall
 10 if it was before September of 2021, but
 11 sometime since January of 2019, I did
 12 discuss it with the medical board of the
 13 National Ovarian Cancer Coalition.
 14 Q. Do you recall any response
 15 of any board members at that discussion?
 16 A. My recollection was that the
 17 other board members didn't really want to
 18 talk about it.
 19 Q. Since September of 2021,
 20 have you become aware of any scientific
 21 or medical group or organization who has
 22 published statements that talc use can
 23 cause ovarian cancer?
 24 MS. O'DELL: Objection.

Page 60

1 THE WITNESS: Not that talc
 2 use can cause ovarian cancer. The
 3 American Cancer Society lists it
 4 as a possible cause and recommends
 5 further investigation.
 6 BY MR. HEGARTY:
 7 Q. Other than the American
 8 Cancer Society, since September 2021,
 9 have you become aware of any other
 10 scientific or medical group or
 11 organization that has made statements
 12 that talc use can cause ovarian cancer or
 13 is associated with ovarian cancer or
 14 statements like the American Cancer
 15 Society has made?
 16 A. So my -- I can't remember
 17 when the Health Canada was finalized, if
 18 that was before or after September '21,
 19 but they do state that talc causes
 20 ovarian cancer in their summary.
 21 The -- yeah, the -- that's
 22 what I recall.
 23 Q. Since September of 2021,
 24 have you talked to any other expert that

Page 61

1 you're aware of in the MDL or other
 2 litigation where there are claims of
 3 talcum powder use and ovarian cancer?
 4 A. I have spoken with Dr.
 5 Clarke-Pearson. He's been on a few of
 6 the phone calls that I've had with the
 7 attorneys. That's the only one -- and I
 8 had dinner once with Ellen Smith, but it
 9 was a social dinner. We didn't really
 10 talk much about the talcum part, just
 11 those two.
 12 Q. To be more specific, since
 13 September 2021, have you talked with any
 14 expert about talcum powder use and
 15 ovarian cancer -- let me restart that.
 16 Since September 2021, have
 17 you talked with either Dr. Saed, Dr.
 18 McTiernan, Dr. Smith-Bindman, or Dr.
 19 Longo about this litigation or talcum
 20 powder and ovarian cancer?
 21 MS. O'DELL: Object to the
 22 form, and it was agreed those were
 23 calls in which counsel was
 24 involved and those would be

<p style="text-align: right;">Page 62</p> <p>1 protected by the work product 2 privilege, so -- 3 MR. HEGARTY: Understood. 4 My question is only whether she's 5 had discussions at this point. 6 MS. O'DELL: I think you 7 asked her what the substance of 8 those discussions were, Mark. 9 That's the basis of my objection 10 -- 11 MR. HEGARTY: To be clear -- 12 let me withdraw that question, but 13 -- and to be clear, my question 14 is, since September 2021, have you 15 had any discussions with Dr. Saed, 16 Dr. McTiernan, Dr. Smith-Bindman, 17 or Dr. Longo about any subject? 18 MS. O'DELL: Not that -- you 19 can answer to the degree that 20 whether you've spoken to one or 21 any of them, but not as to the 22 substance, Dr. Wolf. 23 THE WITNESS: The only one I 24 recall is a phone call, less than</p>	<p style="text-align: right;">Page 64</p> <p>1 talcum powder cases? 2 A. I'm trying to -- I'm trying 3 to remember. Let me look at my notebook 4 here. I... 5 (Pause.) 6 MS. O'DELL: Explain to him 7 what you were looking at. 8 THE WITNESS: Yeah, so I'm 9 looking in my notebook with my 10 report, which also has Dr. 11 Godleski's reports, but that was 12 before September of 2021, so the 13 answer would be no. 14 BY MR. HEGARTY: 15 Q. Since September of 2021, 16 have you reviewed any other witness' 17 testimony in a case involving talcum 18 powder use and ovarian cancer? 19 A. No. 20 Q. Since September of 2021, 21 have you done any work or analysis of any 22 testing done on talcum powder for the 23 presence of asbestos? 24 MS. O'DELL: Would you mind</p>
<p style="text-align: right;">Page 63</p> <p>1 five minutes, with attorneys with 2 Dr. Smith-Bindman, none of the 3 others. 4 BY MR. HEGARTY: 5 Q. When was that approximate 6 five-minute call in relation to today? 7 A. It was yesterday. 8 Q. Other than that one call 9 with Dr. Smith-Bindman yesterday and you 10 mentioned a previous call with Dr. 11 Clarke-Pearson, have you had any -- been 12 on any calls or had any calls with any 13 other expert with regard to the MDL or 14 any other litigation involving talcum 15 powder use and ovarian cancer? 16 A. No. 17 Q. You mentioned at the start 18 of our discussion that you had reviewed 19 recently two reports by Dr. Longo and a 20 report by Dr. Levy that were drafted back 21 in November 2023. 22 Besides those reports, since 23 September 2021, have you reviewed any 24 other experts' MDL or other reports in</p>	<p style="text-align: right;">Page 65</p> <p>1 repeating your question, Mark? I 2 think I missed -- 3 MR. HEGARTY: Sure. 4 BY MR. HEGARTY: 5 Q. Since September of 2021, 6 have you done any work or analysis of any 7 testing done on talcum powder for the 8 presence of asbestos? 9 MS. O'DELL: Object to the 10 form. 11 THE WITNESS: Other than the 12 reports that we -- you mentioned 13 before, Dr. Longo's exposure 14 report and his third amendment 15 report, no. 16 BY MR. HEGARTY: 17 Q. Since September of 2021, 18 have you done any work or analysis of any 19 animal testing involving talcum powder or 20 asbestos exposure? 21 A. Not that I recall. I don't 22 believe any of the new literature had any 23 animal testing. There's not a good 24 animal model for ovarian cancer, so...</p>

<p style="text-align: right;">Page 66</p> <p>1 Q. That was going to be sort of 2 my next question. Are you aware of any 3 animal studies conducted since September 4 2021 where the animals were exposed to 5 talc or asbestos? 6 A. Not that I'm aware of. 7 Again, ovarian cancer in animals doesn't 8 happen very -- in very many animals. I 9 believe guinea pigs and egg-laying hens 10 occasionally get ovarian cancer, but 11 there isn't a good model, so there isn't 12 a lot of research on animals and ovarian 13 cancer. 14 Q. Since September of 2021, 15 have you done any medical or scientific 16 literature research specifically for 17 purposes of your testimony in this case? 18 A. Yes. 19 Q. Did that medical or 20 scientific literature involve using 21 online resources for medical and 22 scientific literature? 23 A. Yes. 24 Q. What online resources have</p>	<p style="text-align: right;">Page 68</p> <p>1 cancer, talcum powder, risk factors, 2 causes. 3 Q. Between September of 2021 4 and today, when did you do the medical or 5 scientific literature research we've been 6 talking about? 7 A. Probably mostly in 2023. I 8 don't remember the specific dates. 9 Q. Are you aware of any medical 10 or other articles you have reviewed since 11 September 2021 that you're aware of today 12 that you know you intend to cite to when 13 discussing your opinions in this case 14 besides those listed in the body of your 15 expert reports? 16 A. Can you ask that question 17 one more time? 18 Q. Sure. Are there any medical 19 or other articles or materials you have 20 reviewed since September 2021 that you're 21 aware of today and that you know you 22 intend to cite to for your -- for 23 purposes of your opinions in this case 24 besides those that are listed in the body</p>
<p style="text-align: right;">Page 67</p> <p>1 you used since September 2021 to do 2 medical or scientific literature research 3 for purposes of your testimony in this 4 case? 5 A. PubMed, which is from the 6 NIH. 7 Q. Have you used any other 8 online resources or other resources to 9 conduct any medical or scientific 10 literature research for your testimony in 11 this case since September of 2021? 12 A. So occasionally if I find a 13 paper on PubMed and there's a reference 14 in it that I'm interested in, I take it 15 directly from that reference and then 16 find the article. I can't remember 17 specifically, but that would be the other 18 way. 19 Q. Do you recall any of the 20 keyword searches you used to do the -- 21 any medical or scientific literature 22 research since September 2021? 23 A. Not specifically, but I 24 would imagine they would include ovarian</p>	<p style="text-align: right;">Page 69</p> <p>1 of your expert reports from November 2 2023? 3 MS. O'DELL: Object to 4 scope. 5 THE WITNESS: So besides 6 those that are listed in the body 7 of my report, yes, I think there 8 are other -- other sources, 9 including the three that we've 10 mentioned earlier, that I'm -- I 11 might cite, yes. 12 BY MR. HEGARTY: 13 Q. We talked about the three 14 you mentioned earlier, the two Longo 15 reports and the Levy report. Are you 16 aware of any other material sitting here 17 today that you know that you will or that 18 you may specifically cite to for your 19 opinions in this case? 20 A. I'm not aware of any that I 21 know I will cite. 22 Q. Since September 2021, have 23 you reviewed any documents produced by 24 Johnson & Johnson for this case that you</p>

<p style="text-align: right;">Page 70</p> <p>1 had not reviewed before?</p> <p>2 A. Not that I recall, no.</p> <p>3 Q. Same question as to a</p> <p>4 company called Imerys or any other</p> <p>5 entity; have you reviewed any documents</p> <p>6 produced by Imerys or any other entity in</p> <p>7 this case besides Johnson & Johnson since</p> <p>8 September 2021 that you had not reviewed</p> <p>9 before?</p> <p>10 A. No.</p> <p>11 Q. Have you done any searching</p> <p>12 across Johnson & Johnson documents or any</p> <p>13 other company's documents related to this</p> <p>14 litigation since September 2021?</p> <p>15 A. No.</p> <p>16 Q. Besides the work we've</p> <p>17 talked about so far today, have you done</p> <p>18 any other work for purposes of your</p> <p>19 amended reports or the opinions you</p> <p>20 intend to offer since September of 2021?</p> <p>21 A. No.</p> <p>22 MR. HEGARTY: I want to mark</p> <p>23 as our first exhibit today the</p> <p>24 scientific -- I'm sorry -- the</p>	<p style="text-align: right;">Page 72</p> <p>1 materials considered list which is</p> <p>2 attached to Exhibit B to your November</p> <p>3 2023 report. I will scroll down through</p> <p>4 it. It goes from page 1 to page 33, with</p> <p>5 the last reference to a paragraph 121.</p> <p>6 Does this appear to be the</p> <p>7 materials considered list that you</p> <p>8 included with your November 2023 amended</p> <p>9 report?</p> <p>10 A. Yes.</p> <p>11 Q. Now, with regard to this</p> <p>12 list, the list previously produced, in</p> <p>13 particular with your September -- with</p> <p>14 your 2021 amended report, was entitled</p> <p>15 "Scientific Literature and Other</p> <p>16 Sources." This list is now entitled</p> <p>17 "Materials Considered."</p> <p>18 Why was the name of the list</p> <p>19 changed, if you know?</p> <p>20 A. I don't recall.</p> <p>21 MS. O'DELL: For</p> <p>22 clarification, Mark, are you</p> <p>23 displaying on the screen the</p> <p>24 Exhibit B from her general report</p>
<p style="text-align: right;">Page 71</p> <p>1 materials considered list that's</p> <p>2 Exhibit B to your November 2023</p> <p>3 report.</p> <p>4 - - -</p> <p>5 (Deposition Exhibit No.</p> <p>6 Wolf-1, Materials Considered List</p> <p>7 Attached as Exhibit B to the</p> <p>8 11/15/23 2nd Amended Export Report</p> <p>9 (General) of Judith Wolf, M.D.,</p> <p>10 was marked for identification.)</p> <p>11 - - -</p> <p>12 MR. HEGARTY: I will share</p> <p>13 my screen with you --</p> <p>14 THE WITNESS: I'm just</p> <p>15 getting my copy. All right.</p> <p>16 (Pause.)</p> <p>17 MR. HEGARTY: Please let me</p> <p>18 know if you can see the document</p> <p>19 on my screen, Dr. Wolf.</p> <p>20 THE WITNESS: I can. Thank</p> <p>21 you.</p> <p>22 BY MR. HEGARTY:</p> <p>23 Q. This document, which I'll</p> <p>24 designate as Exhibit No. 1, is the</p>	<p style="text-align: right;">Page 73</p> <p>1 or from one of the case specifics</p> <p>2 --</p> <p>3 MR. HEGARTY: Thank you.</p> <p>4 MS. O'DELL: Not that it</p> <p>5 matters -- not that it matters a</p> <p>6 ton in terms of what you're going</p> <p>7 over right now, but I just want to</p> <p>8 make sure the record's clear.</p> <p>9 MR. HEGARTY: Yeah, this is</p> <p>10 -- Exhibit No. 1 is from Dr.</p> <p>11 Wolf's general report.</p> <p>12 MS. O'DELL: Okay. Thank</p> <p>13 you.</p> <p>14 BY MR. HEGARTY:</p> <p>15 Q. Did you prepare this</p> <p>16 materials considered list, Dr. Wolf?</p> <p>17 A. Yes.</p> <p>18 Q. Scrolling down this list to</p> <p>19 paragraph 441, the paragraphs after 441</p> <p>20 through --</p> <p>21 MS. O'DELL: Mark, it's</p> <p>22 really hard to see what you're</p> <p>23 doing because it's -- and I</p> <p>24 recognize we're at limitations, so</p>

<p style="text-align: right;">Page 74</p> <p>1 you're going quickly, so she's</p> <p>2 looking on her hard copy --</p> <p>3 MR. HEGARTY: Sure.</p> <p>4 MS. O'DELL: -- so just give</p> <p>5 her a little time to catch up.</p> <p>6 MR. HEGARTY: Sure. I think</p> <p>7 my question will be clear.</p> <p>8 BY MR. HEGARTY:</p> <p>9 Q. From my review of this list</p> <p>10 compared to your prior list, when looking</p> <p>11 at the literature list, paragraphs 441</p> <p>12 through 531 are new.</p> <p>13 Is that your understanding</p> <p>14 as well?</p> <p>15 A. That seems about correct.</p> <p>16 Q. With regard to the articles</p> <p>17 from 441 through 531, did you find all of</p> <p>18 those articles yourself?</p> <p>19 A. No, some of them I found;</p> <p>20 and some of them, the attorneys found and</p> <p>21 shared with me.</p> <p>22 Q. With regard to those</p> <p>23 articles that they found and shared with</p> <p>24 you, was that at your request or did they</p>	<p style="text-align: right;">Page 76</p> <p>1 published before 2021 and so I'm</p> <p>2 sure that some of them were</p> <p>3 familiar to me before.</p> <p>4 Specifically looking at</p> <p>5 articles 452 to 466 or 7, those</p> <p>6 have a lot to do with genetics and</p> <p>7 some of those are older articles</p> <p>8 that I would have read previously.</p> <p>9 BY MR. HEGARTY:</p> <p>10 Q. As you just referenced, a</p> <p>11 number of the articles between 441 and</p> <p>12 531 are focused on cancer genetics</p> <p>13 including gene mutations. Was this the</p> <p>14 focus of your literature review since</p> <p>15 September 2021?</p> <p>16 A. Somewhat, yes.</p> <p>17 Q. And how do articles</p> <p>18 concerning cancer genetics inform your</p> <p>19 opinions in this case?</p> <p>20 MS. O'DELL: Object to the</p> <p>21 form. You're talking about in --</p> <p>22 you know, in general, in terms of</p> <p>23 her general opinions, Mark, or are</p> <p>24 you talking about something more</p>
<p style="text-align: right;">Page 75</p> <p>1 send them to you without you making a</p> <p>2 request?</p> <p>3 A. I think it was both.</p> <p>4 Q. With regard to the articles</p> <p>5 from 441 to 531 in Exhibit No. 1, did you</p> <p>6 read the entirety of each of the articles</p> <p>7 listed?</p> <p>8 A. Not every one. Some of</p> <p>9 them, I read the entire article. Some of</p> <p>10 them, I read the abstract and the results</p> <p>11 and didn't -- didn't go into any further</p> <p>12 detail if I didn't think it was pertinent</p> <p>13 to helping me make my opinion.</p> <p>14 Q. Did you read each of the</p> <p>15 articles from 441 through 531 sometime in</p> <p>16 the year of 2023?</p> <p>17 A. 2022 or 2023, yes.</p> <p>18 Q. Are the articles from 441 to</p> <p>19 531 all new to you since September of</p> <p>20 2021?</p> <p>21 MS. O'DELL: If you need to</p> <p>22 look, just take a minute.</p> <p>23 THE WITNESS: Yeah, let me</p> <p>24 just look. Some of them were</p>	<p style="text-align: right;">Page 77</p> <p>1 specific?</p> <p>2 MR. HEGARTY: I think it</p> <p>3 would be as to any opinions that</p> <p>4 you intend to offer in this case,</p> <p>5 Dr. Wolf.</p> <p>6 THE WITNESS: So two of the</p> <p>7 patients had genetic -- I think</p> <p>8 all of my patients in the</p> <p>9 bellwether cases, all of them had</p> <p>10 genetic testing and this was just</p> <p>11 to do a deeper dive on any</p> <p>12 findings in genetics specifically</p> <p>13 for anything that they had and</p> <p>14 just to be aware of every new</p> <p>15 mutation that might be related to</p> <p>16 ovarian cancer risk.</p> <p>17 BY MR. HEGARTY:</p> <p>18 Q. You cite to a number of</p> <p>19 these articles from 441 to 531 in the</p> <p>20 body of your report, including such</p> <p>21 articles as Woolen and Phung, which we'll</p> <p>22 talk about.</p> <p>23 Are there any other articles</p> <p>24 from 441 to 531 that you know sitting</p>

<p style="text-align: right;">Page 78</p> <p>1 here today you intend to specifically 2 cite to when providing your opinions that 3 are not referenced in the body of your 4 general expert report? 5 A. As I'm sitting here today, 6 not that I'm aware of, no. 7 Q. We were provided three days 8 ago by counsel for plaintiffs folders 9 that included general causation 10 materials. Those folders included a 11 section or a part called Lynch systematic 12 review tables. 13 Are you familiar with 14 reviewing something that you would 15 characterize as Lynch systematic review 16 tables? 17 A. Not that I recall called 18 that. 19 MS. O'DELL: Mark, those 20 folders -- 21 MR. HEGARTY: Go ahead, 22 Leigh. 23 MS. O'DELL: Those folders 24 were prepared by counsel to</p>	<p style="text-align: right;">Page 80</p> <p>1 - - - 2 (Deposition Exhibit No. 3 Wolf-2, "Folder #2 General 4 Causation Materials, Lynch 5 Systematic Review Tables", was 6 marked for identification.) 7 - - - 8 MR. HEGARTY: This is a list 9 of materials that we were provided 10 three days ago and you can see 11 from the first page I'm looking at 12 this Lynch systematic review 13 tables. 14 Do you see what I'm 15 referring to? 16 THE WITNESS: I do. 17 BY MR. HEGARTY: 18 Q. And did you review the 19 tables from this publication by Lynch? 20 A. Yes. 21 Q. I'm also going to scroll 22 down and the second page, there's a 23 number of expert reports referenced for 24 Dr. Crowley and Dr. Longo and Dr.</p>
<p style="text-align: right;">Page 79</p> <p>1 disclose and I've named the 2 folders. 3 So Lynch is the Lynch 4 systematic review that's published 5 that's on Dr. Wolf's list and 6 there are e-tables that were 7 multiple documents, and that was 8 just an easier way to put them in 9 the folder. 10 That really has nothing to 11 do with Dr. Wolf. That was a 12 clerical choice I made. 13 MR. HEGARTY: Okay. Thank 14 you. 15 Let me show you specifically 16 the list of those folders. I'll 17 share my screen with you again. 18 Please let me know if you 19 can see my screen, Dr. Wolf. 20 THE WITNESS: I can see your 21 screen. 22 MR. HEGARTY: And I'll 23 designate this document as Exhibit 24 No. 2.</p>	<p style="text-align: right;">Page 81</p> <p>1 McTiernan from back in 2018. There's a 2 reference to a Dr. Yessian. There's a 3 reference to Dr. Huh's testimony, to 4 Johns Hopkins' testimony. 5 Do you see where I'm looking 6 at Dr. Wolf? 7 A. I do, yes. 8 Q. Are these all materials you 9 have in your possession? 10 A. I don't have hard copies of 11 all of those in my possession, no. 12 MS. O'DELL: Mark, just for 13 clarity and really an objection to 14 make sure we're clear, these 15 materials have been on Dr. Wolf's 16 reliance list, some of them in her 17 2018 report, some of them in her 18 2021 materials considered list. 19 And so, you know, she's been 20 examined on those or that there's 21 been opportunity to examine her on 22 those previously and I would 23 object to anything that's sort of 24 retreading that old ground.</p>

<p style="text-align: right;">Page 82</p> <p>1 MR. HEGARTY: My question 2 really goes to, for example, a 3 reference to the Daubert opinion 4 or the Daubert order -- do you see 5 where I'm looking at Dr. Wolf? 6 THE WITNESS: I do. 7 BY MR. HEGARTY: 8 Q. -- those are not referenced 9 anywhere in your materials considered 10 list; correct? 11 MS. O'DELL: If you're going 12 to ask -- they are. I will 13 represent as this officer of the 14 court those are on her materials 15 list, happy to point out the 16 number -- 17 MR. HEGARTY: Sure, please. 18 Yeah, Leigh, please direct me to 19 the number where those are listed. 20 MS. O'DELL: Yeah, if you 21 don't mind, let me see your hard 22 copy -- 23 MR. HEGARTY: No, please, I 24 mean, I don't want to -- I don't</p>	<p style="text-align: right;">Page 84</p> <p>1 the body of her report, 2 depositions in Exhibit No. 69 on 3 materials considered. 4 MR. HEGARTY: Margaret, that 5 is for -- oh, Julie Pier. 6 MS. THOMPSON: Yes. 7 MR. HEGARTY: How about Dr. 8 Huh, is he listed there in the 9 materials considered list? 10 MS. O'DELL: I mean, Mark, 11 I'm pretty sure he is -- 12 Margaret's going to help with the 13 number. 14 MS. THOMPSON: Yeah. 410. 15 MS. O'DELL: Number 410. 16 But just again, you know, these 17 have been on her list a long time 18 and this -- these materials were 19 produced, I believe, in relation 20 to her 2019 deposition, but for 21 sure, I'm absolutely confident, 22 they were disclosed for her 2021 23 deposition, because essentially we 24 used the same folder for</p>
<p style="text-align: right;">Page 83</p> <p>1 want to take time up that's 2 unnecessary. I just could not 3 find them. 4 MS. O'DELL: I think they're 5 -- I haven't looked at them 6 recently, but I can tell you they 7 were on there and I'm pretty sure 8 there's -- 9 MS. THOMPSON: It's 362. 10 MS. O'DELL: Thanks. So 11 look at number 362, you'll see the 12 Daubert opinion. 13 MR. HEGARTY: Okay. Thank 14 you. What about -- 15 MS. O'DELL: 363, you'll see 16 the Blount testimony -- all of 17 this has been on her list 18 previously. 19 MR. HEGARTY: Could you 20 point me to references to Julie 21 Pier or Johns Hopkins or Dr. Huh? 22 MS. O'DELL: Yes. Just a 23 moment. 24 MS. THOMPSON: Pier is in</p>	<p style="text-align: right;">Page 85</p> <p>1 convenience. 2 BY MR. HEGARTY: 3 Q. Since September 2021, Dr., 4 have you reviewed any of the reports or 5 testimony that are listed on the page 6 we're looking at of Exhibit 2? 7 A. Have I re-reviewed them? 8 Not to my recollection. 9 Q. Thank you. 10 Have you reviewed any 11 medical records for Ms. Judkins, Ms. 12 Bondurant, or Ms. Gallardo since 13 September 2021? 14 A. Yes. 15 Q. Have you reviewed -- 16 A. Not -- not for Ms. Bondurant 17 because she's deceased, but for Ms. 18 Judkins and Ms. Gallardo. 19 Q. Are the records that you 20 reviewed since September 2021 identified 21 in your amended reports for Ms. Judkins 22 and Ms. Gallardo? 23 A. Yes. 24 Q. Other than those records</p>

<p style="text-align: right;">Page 86</p> <p>1 referenced in your case-specific reports 2 for Ms. Judkins and Ms. Gallardo, have 3 you reviewed any other medical records 4 for those two women -- 5 A. No. 6 Q. -- since September 2021? 7 A. No. 8 Q. Is there anything in the 9 additional medical records you reviewed 10 since September 2021 that you intend to 11 comment about or rely on for your 12 opinions in this case as to Ms. Judkins? 13 A. No. 14 Q. Same question as to Ms. 15 Gallardo. 16 MS. O'DELL: Would you 17 repeat the questions? 18 MR. HEGARTY: Sure. 19 BY MR. HEGARTY: 20 Q. Is there anything in the 21 additional medical records you reviewed 22 since September 2021 for Ms. Gallardo 23 that you intend to comment about or rely 24 upon for your opinions as to her case?</p>	<p style="text-align: right;">Page 88</p> <p>1 since September 2021? 2 A. No. 3 Q. Has there been any change in 4 the methodology you applied to the 5 causation issues for Ms. Gallardo since 6 September 2021? 7 A. No. 8 Q. Has there been any change in 9 the methodology you applied to the 10 causation issues for Ms. Bondurant since 11 September of 2021? 12 A. No. 13 Q. Has there been any change in 14 the methodology you applied to the 15 general causation opinions that you have 16 and that are set out in your reports 17 since September of 2021? 18 A. No. 19 Q. Have any of the methodology 20 you applied in the four reports been 21 published in any journal to your 22 knowledge? 23 A. Since 2021? I'm not sure 24 what you're asking.</p>
<p style="text-align: right;">Page 87</p> <p>1 MS. O'DELL: Other than what 2 she stated in her report? 3 MR. HEGARTY: I can add that 4 if you want. 5 Other than what's in the 6 body of your report. 7 THE WITNESS: Not other than 8 what's in the body of my report. 9 BY MR. HEGARTY: 10 Q. Have any of your opinions 11 changed since September 2021 as to Ms. 12 Judkins? 13 A. No. 14 Q. Have any of your opinions 15 changed since September 2021 as to Ms. 16 Gallardo? 17 A. No. 18 Q. Have any of your opinions 19 changed in any way since September 2021 20 as to Ms. Bondurant? 21 A. No. 22 Q. Has there been any change in 23 the methodology you applied to the 24 causation issues for Ms. Judkins' case</p>	<p style="text-align: right;">Page 89</p> <p>1 Q. Let me limit it in that way. 2 Since September 2021, are you aware of 3 any publications that have set out or 4 describe the type of methodology you 5 applied to the three plaintiffs' cases in 6 your general opinions in this case? 7 A. Not that -- 8 MS. O'DELL: Objection to 9 the form. Excuse me. 10 THE WITNESS: Sorry. Not 11 that I've reviewed. 12 BY MR. HEGARTY: 13 Q. Ms. Gallardo is currently 73 14 years old; is that right? Does that 15 sound right? 16 A. That sounds right. I'm 17 going to get her report just -- 18 Q. Sure. Go ahead. 19 A. -- if you're going to ask 20 questions about her. 21 Q. I will mark it, but I am 22 going to ask some questions about her and 23 Ms. Judkins. 24 A. Okay.</p>

Page 90

1 Q. Do you have any -- I'm
 2 sorry. I'll let you get those --
 3 MS. O'DELL: Thank you.
 4 THE WITNESS: Yeah, let me
 5 get the reports out. So Judkins
 6 and Gallardo; correct?
 7 MR. HEGARTY: Correct.
 8 (Pause.)
 9 THE WITNESS: All right. I
 10 have them both in front of me.
 11 BY MR. HEGARTY:
 12 Q. Starting with Ms. Gallardo
 13 --
 14 A. Yes.
 15 MS. O'DELL: Take your time.
 16 Just get situated.
 17 THE WITNESS: Okay. Ms.
 18 Gallardo.
 19 BY MR. HEGARTY:
 20 Q. -- again, she is now, here
 21 in 2024, 73 years old; correct?
 22 A. She was born in '52, so she
 23 would be 72 years old.
 24 Q. Ms. Gallardo is now more

Page 91

1 than ten years out of her ovarian cancer
 2 diagnosis; is that correct?
 3 A. Yes, that's correct.
 4 Q. Have you reviewed all of her
 5 visits with her gynecologic oncologist,
 6 Dr. Mutch, since September of 2021?
 7 A. Yes.
 8 Q. She has had no recurrence of
 9 her cancer; correct?
 10 A. That's correct.
 11 Q. Dr. Mutch's reports state
 12 that she is in good health and doing
 13 well; correct?
 14 MS. O'DELL: Objection to
 15 the form. Is that a quote or are
 16 you -- because if so, we need to
 17 look at that.
 18 MR. HEGARTY: It's not a
 19 quote. It's my summary of my
 20 review of his records.
 21 THE WITNESS: Of the records
 22 that I've seen, her last visit was
 23 with Dr. Mutch on May 31st, 2023
 24 when she was doing well and her

Page 92

1 CA125 continued to be in the
 2 normal range.
 3 BY MR. HEGARTY:
 4 Q. Her records report that her
 5 prior cancer diagnosis is not limiting
 6 her ability to do whatever activities she
 7 wants.
 8 Do you recall that?
 9 A. I don't recall that
 10 specifically, but --
 11 Q. Do you --
 12 A. -- she is doing well.
 13 Q. Is it your opinion that Ms.
 14 Gallardo will have a reoccurrence of her
 15 ovarian cancer?
 16 A. I don't know.
 17 Q. Is it your opinion that more
 18 likely than not, she will have a
 19 reoccurrence of her ovarian cancer?
 20 A. It's my opinion that I don't
 21 know if she will have a recurrence of her
 22 ovarian cancer and that's all I can say.
 23 Q. Do you recall Dr. Mutch
 24 testifying that from his standpoint, she

Page 93

1 is cured and put her chance of
 2 reoccurrence at less than 5 percent? Do
 3 you recall his testimony along those
 4 lines?
 5 MS. O'DELL: Excuse me,
 6 mark. I'll just object. She was
 7 examined on Dr. Mutch's testimony
 8 during her 2021 deposition.
 9 MR. HEGARTY: This is sort
 10 of a foundational question for
 11 this updated deposition.
 12 BY MR. HEGARTY:
 13 Q. Do you recall him testifying
 14 along those lines?
 15 MS. O'DELL: If you recall
 16 and you feel comfortable answering
 17 the question, you can. If you
 18 need to see the deposition, we'll
 19 put it in front of you.
 20 THE WITNESS: Yeah, I don't
 21 recall the details of his
 22 deposition.
 23 BY MR. HEGARTY:
 24 Q. Let me ask it then in a

Page 94

1 different way: Do you have any opinion
 2 as to the percent likelihood that Ms.
 3 Gallardo will have a reoccurrence of her
 4 ovarian cancer?
 5 A. All I can say is that I've
 6 had patients recur more than ten years
 7 after their diagnosis. I am not aware of
 8 clear statistics about the risk factors
 9 of recurrence at ten years after
 10 diagnosis versus five years or fifteen
 11 years.
 12 Generally, the longer the
 13 patient goes, the less chance there is,
 14 but there are so few ovarian cancer
 15 patients who survive more than ten years
 16 without a recurrence that there isn't
 17 good data about what's the chance of it
 18 coming back.
 19 And because it may always
 20 come back, we follow them usually as long
 21 as they're willing to come see GYN
 22 oncologists and they're alive.
 23 Q. How many patients have you
 24 had that have had a reoccurrence more

Page 95

1 than ten years after their original
 2 diagnosis with the same stage and type of
 3 cancer that Ms. Gallardo had?
 4 A. So she had a Stage IIA. I
 5 can say, in my entire practice, I've only
 6 had probably five or less patients who
 7 had a Stage IIA ovarian cancer. That's
 8 quite uncommon. And so I don't recall.
 9 But there -- this is an
 10 uncommon stage to find. Most patients
 11 are Stage III or IV. And certainly --
 12 Q. Do you know -- I'm sorry to
 13 interrupt.
 14 A. Certainly of my patients who
 15 were Stage III or IV, I've had several
 16 who were free of disease for ten years or
 17 more and then recurred.
 18 Q. Do you have any opinions
 19 regarding Ms. Gallardo's life expectancy?
 20 A. Well, I know that the
 21 average life expectancy of women in the
 22 United States is 78. And so she's 72, so
 23 that would be average, putting all women
 24 together. I don't have any specific

Page 96

1 predictions on her life expectancy.
 2 Q. Since September 2021, have
 3 you had any communication with Ms.
 4 Gallardo?
 5 A. No.
 6 Q. Turning next to Ms. Judkins
 7 --
 8 A. Okay.
 9 Q. -- when you're ready, how
 10 old is Ms. Judkins?
 11 A. Give me one minute.
 12 (Pause.)
 13 THE WITNESS: Ms. Judkins
 14 was born in 1956, so she's 68.
 15 BY MR. HEGARTY:
 16 Q. She is now more than seven
 17 years out of her diagnosis; does that
 18 sound right?
 19 A. Yes.
 20 Q. Have you reviewed all of her
 21 visits with her treating gynecologic
 22 oncologist since September 2021?
 23 A. Yes.
 24 Q. Are those records referenced

Page 97

1 in your amended report for Ms. Judkins of
 2 November 2023?
 3 MS. O'DELL: Object to the
 4 form.
 5 THE WITNESS: I thought they
 6 were. I'm trying to find -- oh,
 7 yes. She was last seen in March
 8 -- or excuse me -- June of 2023
 9 and was found to have no evidence
 10 of disease.
 11 BY MR. HEGARTY:
 12 Q. Since 2021 -- or let me
 13 strike that, let me make it more broad.
 14 Ms. Judkins has had no
 15 reoccurrence of her ovarian cancer;
 16 correct?
 17 A. That's correct.
 18 Q. Is it your opinion in this
 19 case that Ms. Judkins will have a
 20 reoccurrence of her ovarian cancer?
 21 A. It's my opinion that I don't
 22 know if she'll have a reoccurrence.
 23 Q. Does that mean it's not your
 24 opinion that more likely than not she

<p style="text-align: right;">Page 98</p> <p>1 will have a reoccurrence?</p> <p>2 MS. O'DELL: Object to the</p> <p>3 form.</p> <p>4 THE WITNESS: Her -- my</p> <p>5 opinion is that she may or may not</p> <p>6 have a recurrence. I don't know</p> <p>7 specifically for her or in a</p> <p>8 patient like her, I can't quote a</p> <p>9 percentage.</p> <p>10 But as I stated before, we</p> <p>11 usually follow these patients as</p> <p>12 long as they're willing to come</p> <p>13 back because they can recur late.</p> <p>14 BY MR. HEGARTY:</p> <p>15 Q. Do you have any opinions</p> <p>16 regarding Ms. Judkins' life expectancy?</p> <p>17 A. No, other than she's 68 and</p> <p>18 the average life expectancy for women in</p> <p>19 the United States I think is 78. I don't</p> <p>20 have any other opinions on her life</p> <p>21 expectancy.</p> <p>22 Q. Do you have any opinions as</p> <p>23 to any limitations that Ms. Gallardo's</p> <p>24 prior cancer diagnosis -- that she's</p>	<p style="text-align: right;">Page 100</p> <p>1 A. I don't know specifically.</p> <p>2 Q. Have you had any discussions</p> <p>3 with Ms. Judkins since September 2021?</p> <p>4 A. No.</p> <p>5 Q. Ms. Gallardo had genetic</p> <p>6 testing done back in 2014. Do you recall</p> <p>7 that?</p> <p>8 A. Yes.</p> <p>9 Q. As of 2024, there are more</p> <p>10 expanded tests than what she had back in</p> <p>11 2014; is that correct?</p> <p>12 A. There are.</p> <p>13 Q. In the last two years, have</p> <p>14 you discussed gene panel testing with any</p> <p>15 of your ovarian cancer patients who had</p> <p>16 previous testing with a gene panel test</p> <p>17 that's not -- let me start over again.</p> <p>18 Since September 2021, have</p> <p>19 you recommended to any patient who</p> <p>20 previously had genetic testing to be</p> <p>21 retested with these more expanded gene</p> <p>22 panel tests?</p> <p>23 A. Not to my recollection, and</p> <p>24 the only time I recall having that</p>
<p style="text-align: right;">Page 99</p> <p>1 currently experiencing?</p> <p>2 MS. O'DELL: Did you mean</p> <p>3 Ms. Judkins or Ms. Gallardo?</p> <p>4 MR. HEGARTY: I meant Ms.</p> <p>5 Gallardo. I had not asked that</p> <p>6 question before. Let me ask it</p> <p>7 again.</p> <p>8 BY MR. HEGARTY:</p> <p>9 Q. As to Ms. Gallardo, do you</p> <p>10 have any opinions as to any way her prior</p> <p>11 cancer diagnosis is currently limiting</p> <p>12 her activities, the things she wants to</p> <p>13 do?</p> <p>14 MS. O'DELL: Object to the</p> <p>15 form.</p> <p>16 THE WITNESS: I don't know</p> <p>17 specifically the answer -- I don't</p> <p>18 know.</p> <p>19 BY MR. HEGARTY:</p> <p>20 Q. Do you have any opinions as</p> <p>21 to Ms. Judkins as whether her prior</p> <p>22 ovarian cancer diagnosis is currently</p> <p>23 limiting any of the activities that she</p> <p>24 is doing or wants to do?</p>	<p style="text-align: right;">Page 101</p> <p>1 discussion with any patient would have</p> <p>2 been a patient where only BRCA1 and 2 may</p> <p>3 have been tested for prior to any of the</p> <p>4 other genes.</p> <p>5 But in general, the vast</p> <p>6 majority of the genetically predisposed</p> <p>7 patients who get ovarian cancer are BRCA1</p> <p>8 or 2 and the penetrance of all of the</p> <p>9 other genes that have been identified</p> <p>10 since then is much lower and so unless</p> <p>11 someone's family history specifically</p> <p>12 points to something that they weren't</p> <p>13 tested for, I don't discuss it with them.</p> <p>14 I've had a few patients</p> <p>15 bring it up and say they thought about</p> <p>16 it, but insurance doesn't pay for them to</p> <p>17 be tested again because basically it's</p> <p>18 like having -- insurance thinks it's like</p> <p>19 having the same test again.</p> <p>20 Q. Currently, do you have a</p> <p>21 particular gene panel test for ovarian</p> <p>22 cancer patients that you prefer?</p> <p>23 A. I don't have any that I</p> <p>24 prefer. It's generally what is offered</p>

Page 102

1 by the hospital or what is covered by the
 2 patient's insurance, because most of them
 3 cover most of the genes that would be
 4 related to either ovarian cancer or any
 5 gynecologic cancers or in some cases
 6 breast cancer.
 7 Q. Are you familiar with the
 8 gene panel testing done by a company
 9 called Myriad?
 10 A. Yes.
 11 Q. Are you familiar with the
 12 gene panel testing done by a company
 13 called Invitae?
 14 A. Yes.
 15 Q. Do you have any opinions
 16 about the gene panel tests that Myriad
 17 offers?
 18 MS. O'DELL: Are you talking
 19 about the current test, Mark, or
 20 do you have --
 21 MR. HEGARTY: The current
 22 test, the current testing.
 23 THE WITNESS: I don't have
 24 any particular opinion about any

Page 103

1 of the companies' test.
 2 BY MR. HEGARTY:
 3 Q. Ms. Gallardo could have
 4 another gene panel test today; correct?
 5 A. She could.
 6 Q. That can be done by a saliva
 7 sample?
 8 A. You know, again, you're
 9 asking me the details about the testing.
 10 I know some of the companies can be
 11 saliva. I don't know if all of them are
 12 saliva today.
 13 Q. Ms. Judkins could also be
 14 retested for genetic mutations today;
 15 correct?
 16 MS. O'DELL: Object to the
 17 form.
 18 THE WITNESS: She could.
 19 One of the whole -- one of the
 20 challenges for many patients is
 21 that they've already been tested.
 22 Their insurance won't pay for
 23 another test and they're usually
 24 in the thousands of dollars.

Page 104

1 BY MR. HEGARTY:
 2 Q. What did you do, Dr. Wolf,
 3 to prepare for your testimony here today?
 4 A. So on my own, I reviewed my
 5 reports, the specific and the general
 6 report, some of the literature, and then
 7 yesterday met with the attorneys for
 8 about four to -- four or five hours, kind
 9 of going over all the same things.
 10 Q. Besides the list you just
 11 provided, did you do anything else to
 12 prepare for today's deposition?
 13 MS. O'DELL: Objection.
 14 THE WITNESS: No. I was
 15 going to say I took a shower, but
 16 that's not appropriate.
 17 BY MR. HEGARTY:
 18 Q. Do you recall any of the
 19 medical literature that is the first
 20 named author of any of the literature you
 21 reviewed to prepare for today's
 22 deposition?
 23 A. Yeah, I mean, most -- the
 24 new -- new papers that I cite in my

Page 105

1 amended report, many of them I reviewed,
 2 Davis, Phung, Woolen, Mandarin, Emi,
 3 Harper. Those are some of the names that
 4 I recall.
 5 Q. You also mentioned that you
 6 met with counsel for plaintiffs
 7 yesterday. Who did you meet with?
 8 A. So in person, I was with
 9 Margaret Thompson and Leigh O'Dell, and
 10 Michelle Parfitt was on Zoom for part of
 11 the time.
 12 Q. Did you have just the one
 13 meeting to prepare for today's
 14 deposition?
 15 A. Yes.
 16 Q. With regard to the fees
 17 you've received for your work in the MDL
 18 or otherwise since September 2021, have
 19 you invoiced all of those fees to counsel
 20 for plaintiffs?
 21 A. Yes. Yes.
 22 Q. Have you been paid for all
 23 of the invoices that you have submitted
 24 since September 2021?

Page 106

1 A. Yes, except for December of
 2 '23, which I just recently submitted that
 3 invoice.
 4 Q. Since September 2021, what
 5 rate have you charged plaintiffs' counsel
 6 for your work in the MDL?
 7 A. It was 600. Then I asked
 8 for 650 about a year ago just because
 9 inflation. Per hour. I'm sorry.
 10 MR. HEGARTY: I'm going to
 11 show you next, Dr. Wolf, the
 12 invoices we were provided in
 13 advance of this deposition, so
 14 I'll share my screen with you
 15 again.
 16 THE WITNESS: Okay. I'm
 17 just putting the medical records
 18 away, two patients, part of the
 19 report. Excuse me.
 20 MR. HEGARTY: I'm going to
 21 mark as Exhibit No. 3 the pages
 22 we're looking at on my screen.
 23 - - -
 24 (Deposition Exhibit No.

Page 107

1 Wolf-3, Thirty-four Pages of
 2 Judith Wolf Invoices Starting with
 3 January 2017, was marked for
 4 identification.)
 5 - - -
 6 BY MR. HEGARTY:
 7 Q. First of all, Dr. Wolf, do
 8 you see my screen?
 9 A. I do.
 10 MS. O'DELL: So, Mark, this
 11 is an invoice from 2017 and I
 12 would object to any examination on
 13 prior invoices. This is -- she's
 14 been examined on that in 20 -- her
 15 deposition after her first report.
 16 We provided, I believe, four
 17 -- three -- three invoices for Dr.
 18 Wolf via Susan. I sent them to
 19 Susan on Monday; and so if you
 20 don't have them, I'm happy to
 21 e-mail them to you if they didn't
 22 make it to you, but they're in the
 23 folder and they were provided to
 24 Susan, as I indicated I would on

Page 108

1 Monday.
 2 MR. HEGARTY: I have those
 3 and I was going to mark those
 4 next.
 5 What I really am looking for
 6 is confirmation that as to the
 7 invoices we were provided prior to
 8 the most recent ones, the three
 9 most recent ones, whether these
 10 are all of Dr. Wolf's invoices for
 11 her work on the MDL litigation.
 12 MS. O'DELL: You know, the
 13 invoices that we previously
 14 provided were in the folder we
 15 gave to you and then we provided
 16 invoices since August of 2023,
 17 since the bankruptcy was
 18 dismissed, and those are the
 19 invoices.
 20 And so, I mean, I don't know
 21 exactly what you're showing on the
 22 screen. Certainly -- I mean,
 23 she's been examined on every
 24 invoice in that folder except for

Page 109

1 the ones in August to December
 2 2023.
 3 BY MR. HEGARTY:
 4 Q. I've scrolled down, Dr.
 5 Wolf, to the invoice we were provided
 6 that's dated September 1, 2021 that
 7 include your August 2021 time.
 8 Do you see what I'm showing
 9 you?
 10 A. Yes.
 11 MS. O'DELL: And that was
 12 provided before her September 2021
 13 deposition, so I just -- I don't
 14 -- I don't know why we're going
 15 back.
 16 MR. HEGARTY: I've just
 17 changed my screen and showing the
 18 three invoices we were provided
 19 from August to December 2023.
 20 BY MR. HEGARTY:
 21 Q. Do you see these invoices on
 22 your screen, Dr. Wolf?
 23 A. Mostly what I see is what's
 24 blacked out. I see August -- yes, August

Page 110

1 -- August through October, yes.
 2 Q. Do you recall that we just
 3 looked at a moment ago that I marked as
 4 Exhibit No. 3 an invoice from August of
 5 2021?
 6 A. Yes.
 7 Q. The first page of this next
 8 set of invoices, which I'll -- again,
 9 I'll mark as Exhibit No. 4 -- is from
 10 August, September, and October of 2023.
 11 Do you see that?
 12 A. Yes.
 13 - - -
 14 (Deposition Exhibit No.
 15 Wolf-4, Three Pages of Judith Wolf
 16 Invoices from August to December
 17 2023, was marked for
 18 identification.)
 19 - - -
 20 BY MR. HEGARTY:
 21 Q. Did you invoice any work you
 22 did on the talcum powder cases in the MDL
 23 since -- between August of 2021 and
 24 August of 2023? In other words, are

Page 111

1 there any invoices between the last one
 2 we looked at in Exhibit No. 3 and this
 3 invoice?
 4 MS. O'DELL: For the MDL
 5 cases?
 6 BY MR. HEGARTY:
 7 Q. Are the invoices we've been
 8 provided just for the MDL cases?
 9 MS. O'DELL: No. Swan's
 10 mentioned in prior invoices, so
 11 that wouldn't be the case. I'm
 12 just trying to understand your
 13 question.
 14 MR. HEGARTY: Well,
 15 hopefully Dr. Wolf understood my
 16 question, but let me ask it again.
 17 BY MR. HEGARTY:
 18 Q. I'm going to jump back to
 19 Exhibit No. 4 and do you recall that the
 20 last invoice is from August 2021?
 21 A. Yes.
 22 Q. And I'll jump back to
 23 Exhibit No. 4 where the invoices picked
 24 up again with the first entry on August

Page 112

1 28th, 2023.
 2 Do you see that?
 3 A. I do.
 4 Q. Did you do any work on the
 5 MDL litigation, or any other litigation
 6 involving talcum powder and ovarian
 7 cancer, between August of 2021 and August
 8 of 2023?
 9 A. There may have been one or
 10 two hours of phone calls to catch up with
 11 what was happening with the bankruptcy,
 12 but very little.
 13 Q. Did you invoice for those
 14 perhaps one or two hours of calls?
 15 A. Yes.
 16 Q. Did you invoice those in the
 17 invoice we're looking at, that is, the
 18 invoice from August 28, 2023 through
 19 October 9, 2023?
 20 A. No. I would have invoiced
 21 them separately, but I don't remember
 22 specifically the dates.
 23 Q. Do you believe that there is
 24 an invoice between -- that you did

Page 113

1 invoice time between August 2021 and
 2 August 2023?
 3 A. I believe there's a few
 4 hours, but I don't remember the dates and
 5 if there was, I invoiced them, yes.
 6 MR. HEGARTY: I don't
 7 believe we've seen those and we
 8 would ask those to be produced if
 9 they do exist.
 10 MS. O'DELL: I will say I'm
 11 not sure what those are. I will
 12 have to go look and I'll follow up
 13 on that.
 14 MR. HEGARTY: Okay. Thank
 15 you.
 16 BY MR. HEGARTY:
 17 Q. The exhibits -- I mean, the
 18 invoices that we have in Exhibit No. 4
 19 are three pages. The first one covers
 20 August 28, 2023 through October 9th,
 21 2023. The second one covers November
 22 11th, 2023 to November 30, 2023. And the
 23 third covers December 10th, 2023 to
 24 December 29, 2023.

Page 114

1 Dr. Wolf, are these your
 2 invoices for your work that you have done
 3 on talcum powder cases since August of
 4 2023 --
 5 A. Yes.
 6 Q. -- through the end of
 7 December 2023?
 8 A. Yes.
 9 Q. Have you been paid for all
 10 of the time you've invoiced in these
 11 three invoices?
 12 A. Yes.
 13 Q. Have you prepared an invoice
 14 for any of the work you've done in
 15 January 2024?
 16 A. No.
 17 Q. Do you recall the number of
 18 hours you've spent so far in 2024 working
 19 on talcum powder cases?
 20 A. No. I -- I log them on my
 21 phone, but I don't remember the number
 22 offhand.
 23 MS. O'DELL: So, Mark, we've
 24 been going about an hour and ten

Page 115

1 minutes. So I don't know if, Dr.
 2 Wolf, if you want a break or you
 3 want to go a little bit longer.
 4 It's up to you.
 5 THE WITNESS: If this is a
 6 good time to break, a break would
 7 be nice.
 8 MR. HEGARTY: Okay. Let's
 9 go ahead and go off the record.
 10 (A recess was taken from
 11 12:54 p.m. to 1:04 p.m.)
 12 MR. HEGARTY: We are back on
 13 the record.
 14 Dr. Wolf, I want to show you
 15 next the C.V. we were provided
 16 with your November 2023 amended
 17 report. I'm going to share my
 18 screen with you. Please let me
 19 know if you can see my screen.
 20 THE WITNESS: I can see your
 21 screen.
 22 MR. HEGARTY: I'm going to
 23 mark this curriculum vitae as
 24 Exhibit No. 5.

Page 116

1 - - -
 2 (Deposition Exhibit No.
 3 Wolf-5, Curriculum Vitae of Judith
 4 K. Wolf, M.D., was marked for
 5 identification.)
 6 - - -
 7 BY MR. HEGARTY:
 8 Q. Do you see where it has your
 9 name at the top, Dr. Wolf?
 10 A. I do.
 11 Q. Do you have a copy of your
 12 current curriculum vitae with you?
 13 A. Let me get it out. I do.
 14 Q. And as you're getting it
 15 out, I'm scrolling down to the very last
 16 page where it -- the document lists:
 17 C.V. updated 1/5/2019.
 18 Do you see that?
 19 MS. O'DELL: She's -- give
 20 her a moment, Mark. I think she's
 21 pulling it out of her notebook.
 22 (Pause.)
 23 THE WITNESS: I see that.
 24 BY MR. HEGARTY:

Page 117

1 Q. Did you last update your
 2 curriculum vitae on January 5th, 2019?
 3 A. No, I just didn't change --
 4 I didn't notice that date. It was in
 5 2023 sometime, and it would have been
 6 sometime after June of 2023, but before
 7 September or October.
 8 Q. Does the curriculum vitae
 9 that we're looking at, what you have in
 10 your hand, accurately reflect and is
 11 current with regard to your medical
 12 education, training, and experience?
 13 A. Yes, except for the -- at
 14 the very beginning, the hospitals, the
 15 current hospitals have changed. I have
 16 worked at Bellin Hospital in Green Bay
 17 and Billings Cancer Center in Montana.
 18 Q. Those two facilities should
 19 be added in the very first page at the
 20 top?
 21 A. That's correct.
 22 Q. Are you aware of any other
 23 changes or additions to your curriculum
 24 vitae to bring it current as of January

Page 118

1 2024?
 2 A. Not that I'm aware of.
 3 Q. Have you developed any
 4 additional or new expertise since
 5 September 2021?
 6 A. No.
 7 Q. Have you had any formal or
 8 informal training on any subject areas
 9 since September 2021?
 10 A. No.
 11 Q. Is there anything new to
 12 your C.V. since September 2021 that you
 13 rely upon for your opinions in this case?
 14 A. No.
 15 Q. Have you -- let me start
 16 over again.
 17 How many publications have
 18 you had since September 2021?
 19 A. I'm going to look at my C.V.
 20 There's been a couple, but I can't
 21 remember -- since I'm not working in
 22 academic medicine anymore, I don't
 23 publish like I used to.
 24 Q. Looking over at the end of

Page 119

1 your publication list, paragraphs 97
 2 through 99, are those your publications
 3 since September 2021?
 4 A. As far as I'm aware, yes.
 5 Q. Thank you.
 6 Since September 2021, have
 7 you prepared any notes, handwritten or
 8 typed notes, as part of your work on this
 9 case?
 10 A. No.
 11 MR. HEGARTY: The next
 12 document I'm going to show you,
 13 which I'll mark as Exhibit No. 6,
 14 is your Notice of Deposition.
 15 - - -
 16 (Deposition Exhibit No.
 17 Wolf-6, Notice of Oral Deposition
 18 of Judith E. Wolf, M.D. and Duces
 19 Tecum in MDL, was marked for
 20 identification.)
 21 - - -
 22 MR. HEGARTY: Please let me
 23 know, Dr. Wolf, if you can see the
 24 notice on your screen.

Page 120

1 THE WITNESS: Yes, I can.
 2 MS. O'DELL: Mark, would you
 3 mind telling me the exhibit number
 4 again? I missed that.
 5 MR. HEGARTY: I'm going to
 6 designate this as Exhibit 6.
 7 MS. O'DELL: Thank you.
 8 BY MR. HEGARTY:
 9 Q. As you can see on the first
 10 page, Dr. Wolf, this makes reference to
 11 your deposition being today starting at
 12 10:00 a.m. Eastern.
 13 Do you see that?
 14 A. I do.
 15 Q. Have you reviewed the
 16 document we're looking at, the notice of
 17 your deposition in the MDL?
 18 A. Yes.
 19 Q. In particular, have you
 20 reviewed the document requests that
 21 accompany this notice?
 22 A. Yes.
 23 Q. Have you provided, in
 24 consultation with your counsel, all of

Page 121

1 the documents that you have that are
 2 referenced in those paragraphs?
 3 MS. O'DELL: Mark, I'll
 4 represent that documents have been
 5 provided to counsel for J & J
 6 consistent with the objections
 7 that we served last week.
 8 MR. HEGARTY: So, Leigh,
 9 does that mean that with regard to
 10 what you have produced, that
 11 whatever it is that you've
 12 produced would be responsive to
 13 this document -- the document
 14 request in the notice; correct?
 15 MS. O'DELL: There were a
 16 number of objections lodged, and
 17 so what I'm saying is that we have
 18 provided to counsel for J & J
 19 documents consistent with our
 20 objections that we served.
 21 MR. HEGARTY: Okay. Thank
 22 you.
 23 THE WITNESS: Just of note,
 24 I just noticed that my name is

Page 122

1 incorrect on this. My middle
 2 initial is not E. It's K.
 3 MR. HEGARTY: Sorry about
 4 that.
 5 THE WITNESS: That's okay.
 6 BY MR. HEGARTY:
 7 Q. Your report also provided in
 8 Exhibit number C, Dr. Wolf, which
 9 concerned medical-legal testimony in last
 10 four years. It referenced testimony on
 11 January 7, 2019, August 30, 2021, and
 12 September 13, 2021, and September 14,
 13 2021.
 14 Is that an accurate list of
 15 the medical-legal testimony you have
 16 given in the last four years?
 17 A. I just pulled it to have it
 18 in front of me, and that is correct.
 19 MR. HEGARTY: Thank you.
 20 I'm going to mark next the amended
 21 reports we have been provided from
 22 November 2021. I'll share each of
 23 those with you.
 24 THE WITNESS: The general

Page 123

1 and for each of the three
 2 patients?
 3 MR. HEGARTY: Yes. Yes, Dr.
 4 Wolf.
 5 THE WITNESS: All right.
 6 MS. O'DELL: Just a moment,
 7 Mark. She's going to get them in
 8 front of her.
 9 MR. HEGARTY: While, Dr.
 10 Wolf, you're pulling those from
 11 your notebook, I'm sharing my
 12 screen with you, which is the --
 13 which is your Second Amended Rule
 14 26 expert report with your general
 15 opinions --
 16 MS. O'DELL: Do you mind
 17 scrolling up to the top just
 18 quickly so we can see the caption?
 19 Okay. So this document relates to
 20 all cases. Thank you.
 21 MR. HEGARTY: Yes.
 22 THE WITNESS: And I have
 23 that in front of me.
 24 MR. HEGARTY: The report

Page 124

1 itself is 21 pages.
 2 BY MR. HEGARTY:
 3 Q. Do you see that, Dr. Wolf?
 4 A. Yes.
 5 Q. Looking at the first page,
 6 is that your signature, Dr. Wolf?
 7 A. Yes, it is.
 8 Q. It is dated November 15,
 9 2023?
 10 A. Yes.
 11 MR. HEGARTY: And, again,
 12 for purpose of the record, I'm
 13 marking as Exhibit No. 7 Dr.
 14 Wolf's Second Amended Rule 26
 15 general expert report dated
 16 November 15, 2023.
 17 - - -
 18 (Deposition Exhibit No.
 19 Wolf-7, 11/15/23 Second Amended
 20 Rule 26 General Expert Report of
 21 Judith Wolf, M.D., was marked for
 22 identification.)
 23 - - -
 24 MR. HEGARTY: I'm showing

Page 125

1 you next -- and I'm not sure why
 2 the caption's taken out, but this
 3 is the --
 4 MS. O'DELL: Is this a
 5 different document, Mark?
 6 MR. HEGARTY: Yeah, this is
 7 the case-specific report for Ms.
 8 Linda Bondurant, which I'll mark
 9 as Exhibit No. 8.
 10 - - -
 11 (Deposition Exhibit No.
 12 Wolf-8, 11/15/23 Amended Rule 26
 13 Bondurant Case-Specific Expert
 14 Report of Judith Wolf, M.D., was
 15 marked for identification.)
 16 - - -
 17 BY MR. HEGARTY:
 18 Q. Do you have that report, Dr.
 19 Wolf?
 20 A. I do and I see it on the
 21 screen and I have the specific report in
 22 front of me.
 23 Q. Does this report likewise on
 24 the first page contain your signature and

Page 126

1 a date of November 15, 2023?

2 A. Yes.

3 MS. O'DELL: So, Mark, for

4 the record, if you'll just scroll

5 down just for a moment, is this --

6 were there redactions on this from

7 someone?

8 MR. HEGARTY: No. This is a

9 copy that I requested. I don't

10 know why the caption in that copy

11 is blacked out.

12 MS. O'DELL: Okay.

13 MR. HEGARTY: But for

14 purposes of the actual exhibit, I

15 will make sure it has the caption

16 on it.

17 MS. O'DELL: That's my

18 request, thank you.

19 MR. HEGARTY: Yes.

20 The next report, which I'll

21 mark as Exhibit No. 9, is what I'm

22 sharing with you on my screen and

23 I'll scroll down to the

24 case-specific part of the report

Page 127

1 where it refers to Ms. Carter

2 Judkins.

3 Do you see that, Dr. Wolf?

4 THE WITNESS: I do.

5 - - -

6 (Deposition Exhibit No.

7 Wolf-9, 11/15/23 Amended Rule 26

8 Judkins Case-Specific Expert

9 Report of Judith Wolf, M.D., was

10 marked for identification.)

11 - - -

12 BY MR. HEGARTY:

13 Q. Scrolling back up to the

14 first page, is this your amended Rule 26

15 expert report dated November 15th, 2023

16 for Ms. Judkins?

17 A. Yes.

18 Q. And, again, that's your

19 signature on the first page?

20 A. Yes.

21 MR. HEGARTY: The last of

22 your amended reports for the three

23 plaintiffs that you are testifying

24 about in the MDL, which I'll mark

Page 128

1 as Exhibit No. 10, is your report

2 for Ms. Gallardo.

3 - - -

4 (Deposition Exhibit No.

5 Wolf-10, 11/15/23 Amended Rule 26

6 Gallardo Case-Specific Expert

7 Report of Judith Wolf, M.D., was

8 marked for identification.)

9 - - -

10 BY MR. HEGARTY:

11 Q. I'll scroll down and show

12 you where you reference Ms. Gallardo.

13 Do you see the page we're

14 looking at starting at page 21 where you

15 refer to Anna Gallardo?

16 A. Yes.

17 Q. Scrolling back up, is the

18 document we're looking at, Exhibit No.

19 10, your amended Rule 26 expert report

20 dated November 15, 2023 as it pertains to

21 Ms. Gallardo?

22 A. Yes.

23 Q. As to the last three reports

24 that we went through for Ms. Bondurant,

Page 129

1 Ms. Judkins, and Ms. Gallardo, is the

2 first part of that report that refers to

3 general issues the same as your general

4 causation report that we marked a moment

5 ago?

6 A. Yes.

7 Q. As to the four reports that

8 we went through, are they all accurate?

9 A. Yes, as far as I'm aware.

10 There might be some typos, but otherwise

11 they're accurate.

12 Q. Are you aware, sitting here

13 today, of any changes or revisions that

14 you know you need to make or want to

15 make?

16 A. No.

17 Q. And with regard to the

18 preparation of the four reports that we

19 just marked as exhibits, were you asked

20 to do anything in the preparation of

21 those reports different than what you had

22 been asked to do for your previous MDL

23 reports?

24 A. No.

Page 130

1 Q. Did you approach the
2 preparation of those amended reports any
3 differently than you did in preparing the
4 prior reports for Ms. Bondurant, Ms.
5 Judkins, and Ms. Gallardo and your
6 general report?
7 A. No.
8 Q. Are there opinions you have
9 formed with regard to talcum powder use
10 and ovarian cancer that you know today
11 you intend to testify to that are not
12 contained in the four reports that we
13 just marked as exhibits?
14 A. Not that I'm aware of.
15 Q. With regard to the new
16 records -- or let me start over again.
17 With regard to the records
18 you reviewed for Ms. Judkins since
19 September 2021, was there anything in
20 those records that provide any evidence
21 that talc use caused or contributed to
22 Ms. Judkins' ovarian cancer?
23 A. Anything new in her records?
24 Q. Yes, Doctor.

Page 131

1 A. Nothing -- nothing new in
2 her records.
3 Q. Since September of 2021, has
4 Ms. Judkins been diagnosed with any
5 respiratory or -- respiratory, lung, or
6 other condition that could be attributed
7 to asbestos exposure?
8 A. Not that was recorded in her
9 medical records that I reviewed.
10 Q. Since September 2021, has
11 Ms. Judkins been diagnosed with any
12 condition that could be related to heavy
13 metal exposure?
14 A. Not that I -- that was in
15 the medical records that I reviewed.
16 Q. Since September of 2021, as
17 to the records you reviewed for Ms.
18 Gallardo, is there anything in those more
19 recent records that provide any evidence
20 that talc use caused or contributed to
21 cause her ovarian cancer?
22 MS. O'DELL: Dr. Wolf, if
23 you need time to get to the right
24 place in your report --

Page 132

1 THE WITNESS: So you're
2 asking about Ms. Gallardo now.
3 Nothing new in her records.
4 BY MR. HEGARTY:
5 Q. Was there anything in her
6 records since September 2021 that
7 indicated she had any respiratory, lung,
8 or other condition that could be
9 attributed to asbestos exposure?
10 A. Not that was in the records
11 that I reviewed.
12 Q. In the records you reviewed
13 since September 2021, was there any
14 indication in those records that Ms.
15 Gallardo had any condition that could be
16 related to heavy metal exposure?
17 A. No.
18 Q. Since September 2021, have
19 you done any analysis to quantify Ms.
20 Judkins' level of exposure to talcum
21 powder?
22 A. Analysis? Do you mean
23 studies?
24 Q. Done your own efforts to

Page 133

1 quantify it, done any qualitative or
2 quantitative analysis, done anything
3 specific as to Ms. Judkins since
4 September 2021 to try to quantify the
5 volume of exposure that she had to talcum
6 powder.
7 MS. O'DELL: Object to the
8 form. Other than what she did
9 previously?
10 MR. HEGARTY: I'm only
11 asking since September 2021.
12 THE WITNESS: No.
13 BY MR. HEGARTY:
14 Q. Same question as to Ms.
15 Gallardo.
16 A. No.
17 Q. Same question as to Ms.
18 Bondurant.
19 A. No.
20 Q. And then the same question
21 as it relates to the three plaintiffs
22 concerning quantifying or otherwise
23 considering since September 2021 their
24 exposure to asbestos: Have you done any

Page 134

1 work yourself since September 2021 to
 2 assess any of these three plaintiffs'
 3 exposure to asbestos?
 4 MS. O'DELL: Object to the
 5 form.
 6 THE WITNESS: No.
 7 BY MR. HEGARTY:
 8 Q. Since September 2021, have
 9 you done any type of analysis to identify
 10 the level of exposure to talc that has
 11 been determined to cause ovarian cancer?
 12 MS. O'DELL: Would you mind
 13 repeating the question, please?
 14 MR. HEGARTY: Sure.
 15 BY MR. HEGARTY:
 16 Q. Since September 2021, have
 17 you done any type of analysis yourself to
 18 identify the level of exposure to talc
 19 that has been determined to cause ovarian
 20 cancer?
 21 MS. O'DELL: Object to the
 22 form.
 23 THE WITNESS: Well, I'm not
 24 sure that there's any evidence

Page 135

1 about what that level is and the
 2 answer would be, no, I have not.
 3 BY MR. HEGARTY:
 4 Q. Since September 2021, have
 5 you done any analysis yourself to
 6 identify the level of exposure to
 7 asbestos that has been determined to
 8 cause ovarian cancer?
 9 MS. O'DELL: Object to the
 10 form.
 11 THE WITNESS: No, other than
 12 I think there was one new article
 13 included in my amended report by
 14 Nowak about showing a relationship
 15 between asbestos exposure and
 16 ovarian cancer, just reviewing the
 17 article. I didn't do any studies
 18 of my mine.
 19 BY MR. HEGARTY:
 20 Q. Similar question: Since
 21 September 2021, have you done any type of
 22 analysis yourself to identify the level
 23 of exposure to any heavy metals that can
 24 either cause or increase the risk of

Page 136

1 ovarian cancer?
 2 MS. O'DELL: Object to the
 3 form.
 4 THE WITNESS: No.
 5 BY MR. HEGARTY:
 6 Q. I want to switch gears here
 7 a little bit and focus on your second
 8 amended Rule 26 report, the general
 9 report, dated November 15, 2023.
 10 Would you please have that
 11 report in front of you?
 12 (Pause.)
 13 THE WITNESS: Yes, I have
 14 it.
 15 MR. HEGARTY: And that
 16 report for purposes of the record
 17 is -- has been previously marked
 18 as Exhibit No. 7 for today's
 19 deposition.
 20 BY MR. HEGARTY:
 21 Q. Please turn first to page 2,
 22 the last paragraph before the section
 23 "Methodology."
 24 A. Yes.

Page 137

1 Q. That last paragraph has the
 2 additional statement that: I am
 3 recruited on a regular basis to serve in
 4 communities which are lacking gynecologic
 5 oncology care.
 6 Who has recruited you since
 7 September of 2021 to provide gynecologic
 8 oncology care?
 9 A. So the locums companies, the
 10 one I currently work with, CompHealth, as
 11 well as some of the other locums
 12 companies, Weatherby Health, Locum
 13 Tenens, All Star Recruiting. Those are
 14 the names I can think of off the top of
 15 my head.
 16 On a weekly at least or more
 17 often basis, they reach out to me about
 18 positions around the country that need
 19 help.
 20 Q. Since September 2021, have
 21 you turned down any request for your
 22 services at any communities?
 23 A. I'm going to say yes.
 24 Sometimes -- and it's usually because I'm

Page 138

1 working as much as I want to work and I
 2 don't want to take more work on.
 3 I also currently working
 4 with CompHealth, it's a lot of work to
 5 get credentialed through a company and
 6 they're good to work with and so when
 7 other companies reach out to me, I
 8 generally turn them down.
 9 Or if it's something I'm
 10 interested in, I might ask CompHealth if
 11 they know about it.
 12 Q. You mentioned the locations
 13 where you have worked since September
 14 2021. Why did you select those locations
 15 to go to?
 16 A. First of all, they needed
 17 help and, second of all, the schedule and
 18 the time that they needed help worked
 19 with me, with my schedule.
 20 Q. When you go to work at those
 21 facilities outside of where you live,
 22 what do you do for accommodations?
 23 A. The company pays for me to
 24 stay at a hotel, CompHealth, the company.

Page 139

1 Q. Thank you.
 2 And you mentioned that
 3 you've been contacted by other entities
 4 like CompHealth. Have you signed up with
 5 or engaged with any other company since
 6 September 2021?
 7 A. No.
 8 Q. Please turn next to page 4
 9 of your report, the second paragraph that
 10 begins "In addition to talc and asbestos
 11 exposure"?
 12 A. Yes.
 13 Q. You added to that paragraph
 14 from your prior report a reference to the
 15 2022 Phung study. Do you see that?
 16 A. Yes.
 17 Q. Did you find the Phung 2022
 18 study yourself?
 19 A. I don't recall.
 20 Q. Do you have a copy of the
 21 Phung 2022 study with you?
 22 A. I do. Let me get it out.
 23 Just give us a minute.
 24 (Pause.)

Page 140

1 THE WITNESS: Okay. I have
 2 the Phung paper in front of me.
 3 BY MR. HEGARTY:
 4 Q. Do you consider this study,
 5 the Phung study, to be a good study?
 6 MS. O'DELL: Object to the
 7 form.
 8 THE WITNESS: I think this
 9 -- that when I look at this --
 10 excuse me -- at this paper, the
 11 OCAC consortium, which is the
 12 authors of this paper, are
 13 well-known experts in GYN
 14 oncology.
 15 In my opinion, it was well
 16 written and the methods were clear
 17 and the results were stated as far
 18 as I can tell correctly, so I
 19 would say yes.
 20 BY MR. HEGARTY:
 21 Q. What does this study add to
 22 your opinions or are new -- or present
 23 new to your opinions in this case?
 24 A. I think what it adds to me

Page 141

1 is, again, it's a group of authors, the
 2 OCAC group, that are well respected. In
 3 this, they state that talc causing
 4 ovarian cancer is a well-established risk
 5 and specifically look -- in this paper,
 6 they're looking at the risk of
 7 endometriosis, which is an inflammatory
 8 process and has been associated with
 9 increased risk of ovarian cancer, as well
 10 as talc, which is an -- causes an
 11 inflammatory response and that, again,
 12 noting and supporting the idea that
 13 inflammation can be a cause of ovarian
 14 cancer.
 15 So those three things, the
 16 group that wrote it, the fact that this
 17 distinguished group accepts talc as a
 18 risk factor, and thirdly that
 19 inflammation as a cause of ovarian cancer
 20 is present with both talc and
 21 endometriosis, and then finally their
 22 result that if a patient has
 23 endometriosis and has had talc exposure,
 24 those two things that are inflammatory

Page 142

1 together increase the risk further than
 2 either alone, which goes to the fact that
 3 having more than one risk factor just
 4 increases the risk of cancer for ovarian
 5 cancer and other types of cancer.
 6 MR. HEGARTY: Thank you.
 7 Before we go any further to talk
 8 about this paper, I'll designate
 9 it for today's deposition as
 10 Exhibit No. 11.
 11 - - -
 12 (Deposition Exhibit No.
 13 Wolf-11, "Effects of Risk Factors
 14 for ovarian cancer in women with
 15 and without endometriosis" Paper
 16 by Phung, et al, was marked for
 17 identification.)
 18 - - -
 19 BY MR. HEGARTY:
 20 Q. You mentioned in your
 21 response, Dr. Wolf, that the authors of
 22 the paper said as to talc causing ovarian
 23 cancer, it is a well-established risk
 24 factor. Where are you looking -- or

Page 143

1 where is that in this paper?
 2 A. I'm looking for the exact
 3 wording. In the introduction, on page 2:
 4 We conducted a comprehensive study of
 5 endometriosis. Our -- and the next
 6 sentence says: Our analysis considers 10
 7 well-established ovarian cancer risk
 8 factors, including body mass index,
 9 talcum powder, i.e., talc use, family
 10 history, and so on.
 11 Q. Thank you.
 12 The study states over on
 13 page 964 that endometriosis --
 14 A. Sorry. This study is pages
 15 1 through 9.
 16 MS. O'DELL: 964 is -- I
 17 think initially it may have had
 18 just no page numbers, but 964 is
 19 the page with results on it; is
 20 that right, Mark?
 21 MR. HEGARTY: Yeah, let me
 22 try and direct it in a better way.
 23 BY MR. HEGARTY:
 24 Q. Please turn to the

Page 144

1 discussion section, Dr. Wolf.
 2 A. I have the discussion
 3 section, okay.
 4 Q. The first line of the
 5 discussion section states that
 6 endometriosis is a common gynecologic
 7 condition and a well-established risk
 8 factor for ovarian cancer.
 9 Do you agree with that
 10 statement?
 11 A. Yes.
 12 Q. Looking back at your report,
 13 prior to citing the Phung study, you cite
 14 -- you say that as to risk factors, they
 15 can act in a cumulative, additive, and/or
 16 synergistic fashion.
 17 Do you see where I'm
 18 reading?
 19 A. I do.
 20 Q. Is it your opinion that the
 21 Phung study showed that talc and
 22 endometriosis act in a cumulative,
 23 additive, and/or synergistic fashion?
 24 MS. O'DELL: Object to the

Page 145

1 form.
 2 THE WITNESS: Well, it's my
 3 opinion that in the results of
 4 this study, if the patient had
 5 both talc exposure and
 6 endometriosis, her risk of ovarian
 7 cancer was greater than if she had
 8 either alone.
 9 BY MR. HEGARTY:
 10 Q. Do the authors make any
 11 statement in this study that talc and
 12 endometriosis act in a cumulative,
 13 additive, or synergistic fashion?
 14 A. I'm looking at the study.
 15 (Pause.)
 16 THE WITNESS: I don't see
 17 those words in the result. I'm
 18 looking at their discussion, find
 19 the part where they're talking
 20 about the two together.
 21 I don't see those words.
 22 BY MR. HEGARTY:
 23 Q. I'll circle back to that
 24 here in a moment. With regard to this

Page 146

1 paper, did you assess its strengths and
 2 weaknesses?
 3 A. Yes. I think I've clarified
 4 some of the strengths. One of the big
 5 strengths is being the author group that
 6 read it -- that wrote it and it seems to
 7 be well designed and clearly reported.
 8 The authors themselves quote
 9 a limitation that endometriosis was
 10 self-reported, and that's one of the
 11 challenges with endometriosis is that if
 12 you haven't had surgery to prove you have
 13 it, it's hard to prove you have it,
 14 although many women probably have been
 15 told they have endometriosis without a
 16 pathologic proof.
 17 Q. Following up on that
 18 statement, Dr. Wolf, the study did not
 19 confirm endometriosis by pathologic
 20 findings; correct?
 21 A. No, as it wouldn't, as this
 22 wasn't a prospective trial where people
 23 who thought they had endometriosis had
 24 surgery to prove they had endometriosis.

Page 147

1 Q. Instead, it relied on
 2 patients' self-reporting of
 3 endometriosis; correct?
 4 A. Yes.
 5 Q. Do you accept in treating
 6 patients self-reporting of endometriosis
 7 as reliable?
 8 A. Yes.
 9 Q. Do you consider a patient to
 10 have previously had endometriosis if they
 11 reported to you that they had the
 12 condition without showing you a record of
 13 confirmation?
 14 MS. O'DELL: Object to the
 15 form.
 16 THE WITNESS: So a
 17 confirmation to absolutely say
 18 someone has endometriosis, they
 19 had to have had surgery. Many
 20 patients have been told by their
 21 physicians that they have
 22 endometriosis without surgery and
 23 I would accept that, whether they
 24 had surgery to prove it or not.

Page 148

1 BY MR. HEGARTY:
 2 Q. Do you consider this article
 3 to be limited to presumed endometriosis
 4 without confirmation?
 5 MS. O'DELL: Object to the
 6 form.
 7 THE WITNESS: I wouldn't
 8 classify it that way.
 9 BY MR. HEGARTY:
 10 Q. Is the absence of
 11 confirmation by pathology of
 12 endometriosis a weakness of this study?
 13 A. The authors say that's a
 14 limitation of their study.
 15 Q. Do you agree with the
 16 authors?
 17 A. It's a limitation. It
 18 doesn't make it a weak study in my
 19 opinion because so many women have been
 20 given the diagnosis of endometriosis
 21 based on symptoms; and until now, as far
 22 as I know, there isn't any other way to
 23 absolutely prove it.
 24 But it's certainly not worth

Page 149

1 putting someone through surgery to prove
 2 pathologically that they have
 3 endometriosis if they have the symptoms
 4 of endometriosis.
 5 Q. If a patient in this study
 6 reported endometriosis and did not have
 7 it, the results would be affected;
 8 correct?
 9 A. It depends on how many
 10 patients reported it and didn't have it.
 11 Q. Depending on that number, it
 12 could affect the results of the paper;
 13 correct?
 14 MS. O'DELL: Object to the
 15 form.
 16 THE WITNESS: Well, I mean,
 17 it's hard to say. I mean, they
 18 had the symptoms of endometriosis
 19 and so then there would have been
 20 some other reason that they had an
 21 increased risk -- I'm not -- I'm
 22 not sure what you're trying to ask
 23 me.
 24 If none of these patients

Page 150

1 had endometriosis, then this paper
 2 probably wouldn't have been
 3 written. I mean, I'm not sure
 4 what you're asking here.
 5 BY MR. HEGARTY:
 6 Q. What I'm asking is, if some
 7 percentage of the patients classified as
 8 having endometriosis actually did not
 9 have it, that can affect the odds ratios
 10 or the relative risks that the study
 11 reports; correct?
 12 A. If there was a significant
 13 enough number of patients who did not
 14 have endometriosis, it might.
 15 Q. We just talked about a
 16 weakness identified by the authors was
 17 not having pathologic confirmation of
 18 endometriosis. From your review of the
 19 study, did it have any other weaknesses?
 20 MS. O'DELL: Objection to
 21 the form. I think Dr. Wolf's
 22 testimony was a limitation --
 23 THE WITNESS: Limitation of
 24 the study, not a weakness of the

Page 151

1 study.
 2 BY MR. HEGARTY:
 3 Q. In your review, does the
 4 paper have any limitations -- I'm sorry.
 5 Let me restate that.
 6 In your review of the paper,
 7 does the paper have any weaknesses?
 8 A. Well, every paper has
 9 strengths and weaknesses. I can't pull
 10 anything else out of this paper
 11 specifically that I would say is a
 12 limitation.
 13 Q. This is a case-control
 14 study; correct?
 15 A. I'm just looking at --
 16 excuse me -- yes, it's a case-control
 17 study.
 18 Q. As such, it is subject to
 19 recall bias; correct?
 20 MS. O'DELL: Objection to
 21 the form.
 22 THE WITNESS: Case-control
 23 studies have -- can have recall
 24 bias.

Page 152

1 BY MR. HEGARTY:
 2 Q. The authors in this paper
 3 did not find any cumulative, additive, or
 4 synergistic effect between talc and
 5 endometriosis; correct?
 6 MS. O'DELL: Objection;
 7 asked and answered.
 8 THE WITNESS: They found
 9 increased risk of ovarian cancer
 10 when both endometriosis and talc
 11 use were present compared to
 12 either alone.
 13 BY MR. HEGARTY:
 14 Q. Please look over in the
 15 discussion section, the third paragraph
 16 from the end beginning with "In
 17 conclusion."
 18 Do you see that paragraph?
 19 MS. O'DELL: Let me -- tell
 20 us again, Mark --
 21 THE WITNESS: So just above
 22 the acknowledgment, so the last
 23 paragraph of the actual paper?
 24 MR. HEGARTY: Yes, the

Page 153

1 paragraph beginning "In
 2 conclusion"?
 3 THE WITNESS: Yes.
 4 BY MR. HEGARTY:
 5 Q. In that paragraph, the
 6 authors state that they found that none
 7 of the interactions that they evaluated
 8 were statistically significant; correct?
 9 MS. O'DELL: Objection to
 10 the form.
 11 THE WITNESS: That's what it
 12 says, yes. And the next sentence
 13 says: There is some suggestion
 14 that associations for BMI, body
 15 mass index, genital talc use, and
 16 hormone therapy, HT, may differ
 17 between women with and without
 18 endometriosis.
 19 BY MR. HEGARTY:
 20 Q. Focusing on the statement
 21 where they say that none of the
 22 interactions that we evaluated were
 23 statistically significant, please turn
 24 over to table 2 -- at least it's table 2

Page 154

1 in my copy -- it's the table that says
 2 "Association between family history and
 3 lifestyle factors and ovarian cancer risk
 4 by endometriosis status."
 5 Do you see that table?
 6 A. Yes.
 7 Q. In that table, as to talc
 8 and endometriosis, the authors did an
 9 interaction test and found no
 10 statistically significant interaction;
 11 correct?
 12 A. I'm looking at -- yes,
 13 that's correct.
 14 Q. That means that --
 15 MS. O'DELL: Excuse me,
 16 Mark. I don't know that she was
 17 finished.
 18 MR. HEGARTY: Okay. I'm
 19 sorry.
 20 MS. O'DELL: If you were,
 21 Doctor, you know, fine, but I
 22 thought you weren't finished.
 23 THE WITNESS: But the
 24 numbers are different. The cases

Page 155

1 and controls without endometriosis
 2 who -- in the patients who had
 3 genital talc use, odds ratio was
 4 1.12 and for those with
 5 endometriosis, it was 1.38.
 6 BY MR. HEGARTY:
 7 Q. So with regard to looking at
 8 statistical significance between those
 9 two odds ratios, statistically, there was
 10 no difference; correct?
 11 A. It was .2, which they did
 12 not consider statistically significant,
 13 but the interaction between those two was
 14 more than any of the other risk factors.
 15 Q. Not finding statistical
 16 significance means that the authors could
 17 not reject the null hypothesis of no
 18 interaction; correct?
 19 MS. O'DELL: Object to the
 20 form.
 21 THE WITNESS: Based on the
 22 statistics they used, that's
 23 correct.
 24 BY MR. HEGARTY:

Page 156

1 Q. Do you mention anywhere in
 2 your report that the Phung authors found
 3 no statistically significant interaction
 4 between talcum powder use and
 5 endometriosis?
 6 A. No. What my report states
 7 is that it -- that paper, the OCAC group,
 8 demonstrated a greater increased risk of
 9 ovarian cancer with genital talc use and
 10 endometriosis versus those without. It
 11 doesn't say statistically significant.
 12 Q. Why isn't the reader of your
 13 report entitled to know that the authors
 14 found no statistically significant
 15 interaction between talcum powder use and
 16 endometriosis?
 17 MS. O'DELL: Objection to
 18 the form.
 19 THE WITNESS: That was not
 20 the point of putting -- putting
 21 this in. The point of putting it
 22 in was, it was another group, this
 23 well-established, respected group
 24 of authors, who accept that talcum

Page 157

1 powder use is a risk for ovarian
 2 cancer and that both endometriosis
 3 and talcum powder can cause
 4 inflammation; and that
 5 inflammation can cause ovarian
 6 cancer, chronic inflammation can
 7 cause ovarian cancer.
 8 I didn't feel that it was
 9 important to add the statistically
 10 significant difference or the P
 11 value. Just it was that two
 12 inflammatory processes increase
 13 the risk more than one.
 14 BY MR. HEGARTY:
 15 Q. Please look back again at
 16 table number 2. With regard to talc use,
 17 it reports odds ratios below 1 for
 18 nongenital talc use with and without
 19 endometriosis.
 20 Do you see that?
 21 A. I do.
 22 Q. Does that mean that using
 23 nongenital talc protects or reduces the
 24 risk against ovarian cancer in patients

Page 158

1 with and without endometriosis?
 2 MS. O'DELL: Objection to
 3 the form.
 4 THE WITNESS: No. Both of
 5 those numbers cross 1 and are --
 6 have a sort of a broad difference
 7 cross 1, so I think it is no
 8 effect.
 9 MS. O'DELL: For clarity,
 10 Doctor, when you say cross 1, are
 11 you talking about the confidence
 12 interval?
 13 THE WITNESS: Yeah, the
 14 confidence intervals cross 1.
 15 BY MR. HEGARTY:
 16 Q. And as far as the confidence
 17 interval crossing 1, is that how you
 18 distinguish the findings in nongenital
 19 users versus the genital users?
 20 MS. O'DELL: Object to the
 21 form.
 22 THE WITNESS: In this case,
 23 it's more of the -- specifically,
 24 it's two things: It crosses 1 and

Page 159

1 it's pretty broad, .49 to 1.19 for
 2 those without endometriosis and
 3 .39 to 1.77.
 4 So it not only crosses 1,
 5 which makes it, you know, less
 6 likely to be significant, but it's
 7 also broad around 1.
 8 BY MR. HEGARTY:
 9 Q. Then for purposes of your
 10 opinions as it relates to this paper and
 11 genital use, are you relying on the
 12 findings in those patients being
 13 statistically significant?
 14 MS. O'DELL: Objection to
 15 the form.
 16 THE WITNESS: Which patients
 17 are you talking about?
 18 MR. HEGARTY: That is, the
 19 patients with genital use of talc
 20 with and without endometriosis.
 21 THE WITNESS: Am I relying
 22 on what -- I'm confused what your
 23 question -- I'm sorry. I'm
 24 confused by the question.

Page 160

1 BY MR. HEGARTY:
 2 Q. You mentioned that you don't
 3 find the results in the nongenital users
 4 to establish a protective or a reduced
 5 risk effect because of the lack of
 6 statistical significance and the size of
 7 the confidence intervals.
 8 Are you relying on the
 9 finding of statistical significance and
 10 the confidence intervals in the genital
 11 talc users with and without endometriosis
 12 for purposes of your opinions in this
 13 case?
 14 A. So I think they're
 15 supportive of my opinions in this case
 16 for talc causing ovarian cancer. It's
 17 another paper that supports it.
 18 Q. One of the authors of this
 19 study is Daniel Cramer. Do you see that
 20 on the first page?
 21 A. Yep.
 22 Q. Are you aware that he has
 23 been a long-time expert for plaintiffs in
 24 talcum powder cases?

Page 161

1 A. Yes.
 2 Q. Have you ever spoken to him?
 3 A. No.
 4 Q. If you look at his
 5 disclosure statement on the first page,
 6 he reports payment for -- I'm sorry.
 7 A. Can you point me to where he
 8 is on the disclosure --
 9 Q. In my copy, it's in the
 10 paragraphs below the Department of
 11 Epidemiology descriptions of all the
 12 authors --
 13 A. Right.
 14 Q. -- do you see the section
 15 where each author is reporting any
 16 conflict of interest?
 17 A. Yeah, there's two paragraphs
 18 there, it looks like. Is it in the first
 19 or the second, just to --
 20 Q. It is in the first and it's
 21 about -- in my copy, about five lines
 22 down where it refers to DWC?
 23 A. I see that now.
 24 Q. And for DWC, which I presume

Page 162

1 is Daniel W. Cramer, he reports payment
 2 for expert testimony from Ferraro Law
 3 Firm and Ashcraft & Gerel law firm and
 4 grant funding to their institution from
 5 the National Institutes of Health.
 6 Do you see that?
 7 A. I do.
 8 Q. Do you know who the Ferraro
 9 Law Firm is?
 10 A. I don't.
 11 Q. Do you know who the Gerel
 12 law firm is?
 13 A. Yes. I believe that's the
 14 law firm that Michelle Parfitt works
 15 with. Is that right? Yes.
 16 Q. Would you --
 17 A. I didn't know that until
 18 today so -- sorry.
 19 Q. Do you consider, given Dr.
 20 Cramer's history of testifying as an
 21 expert for plaintiffs in talc cases, this
 22 disclosure to be a proper conflict of
 23 interest disclosure for him being an
 24 author on this paper?

Page 163

1 MS. O'DELL: Object to the
 2 form.
 3 THE WITNESS: So as far as I
 4 can tell, yes, and I'm -- and I'm
 5 assuming and I'm sure that the
 6 Environment and Epidemiology
 7 Journal felt it was appropriate
 8 and enough disclosure.
 9 BY MR. HEGARTY:
 10 Q. If you were an author on
 11 this study, would a disclosure that you
 12 receive fees from a law firm be
 13 sufficient?
 14 MS. O'DELL: Object to the
 15 form.
 16 THE WITNESS: The -- yes, I
 17 think that his -- his disclosure
 18 is -- is -- I'm losing my words --
 19 is enough, and I would follow
 20 whatever the rules of the journal
 21 article said that I had to
 22 disclose.
 23 But to me, it's clear that
 24 he was an expert witness for law

Page 164

1 firms and he got grant funding
 2 from the NIH.
 3 BY MR. HEGARTY:
 4 Q. Is there any indication from
 5 this disclosure that he received payments
 6 for expert testimony in talcum powder
 7 cases?
 8 A. Not in those words, no.
 9 Q. Please turn next in your
 10 report, Dr. Wolf, to the section
 11 "Epidemiology," which is part 5, I
 12 believe on page -- at the bottom of page
 13 5.
 14 A. Yes.
 15 Q. Are you there?
 16 A. I am.
 17 Q. In the first paragraph,
 18 towards the end, you have -- you now
 19 report two pooled analyses where your
 20 previous report reported one.
 21 What is the additional
 22 pooled analysis you're referring to in
 23 that paragraph?
 24 A. I'm looking.

Page 165

1 (Pause.)
 2 MS. O'DELL: Object to the
 3 form.
 4 (Pause.)
 5 THE WITNESS: I think it's
 6 the O'Brien that I'm referring to
 7 as the second pooled analysis --
 8 or maybe the Davis one.
 9 (Pause.)
 10 THE WITNESS: It's gotta be
 11 either the O'Brien or the Davis.
 12 I think the Davis probably because
 13 it's 2021.
 14 BY MR. HEGARTY:
 15 Q. Carrying on in that same
 16 sentence, you revise the number of
 17 meta-analysis from 7 to 10. What are the
 18 three additional meta-analysis since
 19 September 2021?
 20 MS. O'DELL: Object to the
 21 form.
 22 THE WITNESS: So -- well,
 23 Woolen for sure. I don't -- I
 24 don't know offhand which ones I

Page 166

1 was referring to.

2 BY MR. HEGARTY:

3 Q. Please turn next, Dr. Wolf,

4 to page 10 of your report.

5 A. Okay.

6 Q. The second and third

7 paragraphs, which include discussions --

8 which include discussions of the Davis

9 and Woolen papers?

10 A. Yes.

11 Q. First of all, you added to

12 your prior MDL report comments about the

13 Davis 2021 study.

14 Did you find the Davis study

15 yourself?

16 A. I don't recall.

17 Q. What does the Davis study

18 add to your opinions in this case?

19 A. Can I get the Davis paper

20 out just --

21 Q. Sure. Yeah, go ahead.

22 (Pause.)

23 MR. HEGARTY: And while Dr.

24 Wolf is looking for that, I'll

Page 167

1 designate the Davis study that

2 we'll talk about as Exhibit No.

3 12.

4 - - -

5 (Deposition Exhibit No.

6 Wolf-12, "Genital Powder Use and

7 Risk of Epithelial Ovarian Cancer

8 in the Ovarian Cancer in Women of

9 African Ancestry Consortium" Paper

10 by Davis, et al, was marked for

11 identification.)

12 - - -

13 THE WITNESS: Okay. I have

14 the Davis study now in front of me

15 and I have my report next to me.

16 To me, it's a more recent,

17 updated study that shows -- that

18 supports my conclusion of talc

19 powder use causing ovarian cancer,

20 both in white and black women, and

21 specifically for high-grade serous

22 cancer of the ovary, which is the

23 most common epithelial type of

24 ovarian cancer.

Page 168

1 BY MR. HEGARTY:

2 Q. How does the Davis paper

3 support your opinions particularly as it

4 relates to high-grade serous ovarian

5 cancer?

6 A. So just, again, supporting a

7 30 to 32 percent in this paper percentage

8 increase of high-grade serous carcinoma

9 in women who use talcum powder.

10 Q. Did you assess the strengths

11 and weaknesses of this study?

12 A. Yeah. And I think one of

13 the strengths is the consortium, the

14 data, where they got their information,

15 from the Ovarian Cancer in Women of

16 African Ancestry Consortium.

17 Q. Are there any weaknesses or

18 limitations to this study?

19 A. I'm just looking at the

20 study again. You know, I think that as

21 we talked about before, in cohort

22 studies, there are -- there can be recall

23 bias, which they -- the authors mention

24 in their discussion of this paper.

Page 169

1 Q. As to this being a cohort

2 study, this is a cohort study of cases

3 and controls; correct?

4 MS. O'DELL: Objection to

5 the form.

6 BY MR. HEGARTY:

7 Q. In other words, it's not a

8 prospective study; correct?

9 A. No, it's a -- it's a

10 retrospective study.

11 Q. You state in your report

12 that the study found among

13 African-American women an increased risk

14 of ovarian cancer with genital talcum

15 powder use.

16 That increase, though, was

17 not statistically significant for all

18 subtypes; correct?

19 A. Yes, but I believe that most

20 of the subtypes were serous and the other

21 subtypes were small numbers, so it would

22 be difficult to look at them

23 specifically.

24 Q. As far as, though, their

Page 170

1 analysis of the risk of ovarian cancer
 2 with genital talcum powder use in African
 3 -- in the African-American women studied,
 4 as it relates to all subtypes, they
 5 cannot reject the null hypothesis of no
 6 significant difference in risk; correct?
 7 A. Not --
 8 MS. O'DELL: Excuse me,
 9 Mark. Would you mind repeating
 10 your question?
 11 MR. HEGARTY: Sure.
 12 BY MR. HEGARTY:
 13 Q. As this study relates to the
 14 African-American women studied and for
 15 all subtypes, they could not reject the
 16 null hypothesis of no significant
 17 difference in risk between talc users and
 18 non-talc users; correct?
 19 MS. O'DELL: Objection to
 20 the form. Are you talking about
 21 all participants or are you
 22 talking about African-American
 23 participants?
 24 MR. HEGARTY: My question, I

Page 171

1 believe, was limited to
 2 African-American women.
 3 MS. O'DELL: It wasn't clear
 4 to me. Okay. Thank you.
 5 THE WITNESS: So in
 6 African-American women, the odds
 7 ratios for all-comers was 1.22.
 8 The confidence interval did cross
 9 1, 0.97 to 1.53.
 10 When I'm looking at the
 11 paper, table 2, the number of
 12 patients, 402, had high-grade
 13 serous cancers and then there was
 14 22 with low grade, 51 with
 15 endometrioid, 23 with clear cell,
 16 40 with mucinous, and 80 with
 17 others.
 18 And so to look at them
 19 individually, they can't, and when
 20 they specifically just looked at
 21 serous, it was statistically
 22 significant.
 23 BY MR. HEGARTY:
 24 Q. When a study cannot reject

Page 172

1 the null hypothesis because the
 2 confidence interval crosses 1, that means
 3 the finding could be due to chance;
 4 correct?
 5 MS. O'DELL: Object to the
 6 form.
 7 THE WITNESS: So that --
 8 that could have -- that could
 9 happen, but this number is
 10 consistent with all the other
 11 numbers in many of the other
 12 studies which are statistically
 13 significant.
 14 BY MR. HEGARTY:
 15 Q. This study -- I'm sorry. Go
 16 ahead.
 17 A. And I -- and I would -- and
 18 I would argue does include mucinous
 19 tumors, which are not thought to be the
 20 same pathologic disease as serous cancers
 21 and endometrioid and clear cell, and so
 22 would generally not be thought to be
 23 related to the same risk factors.
 24 Q. You just mentioned over in

Page 173

1 table 2 that the study looked at
 2 histotypes of ovarian cancer in
 3 African-American women besides high-grade
 4 serous; correct?
 5 A. Yes.
 6 Q. And in particular, it lists
 7 in table 2 that they looked at patients
 8 with low-grade serous, endometrioid,
 9 clear cell, mucinous, and other types of
 10 ovarian cancer; correct?
 11 A. Yes.
 12 Q. And with regard to the other
 13 histotypes that -- besides high-grade
 14 serous, the authors -- what did the
 15 authors find in terms of the relative
 16 risk or odds ratio?
 17 A. They didn't specifically
 18 look at them individually because the
 19 numbers are small; and as I mentioned,
 20 for mucinous tumors, it's thought to be a
 21 different pathway with different set of
 22 risk factors. It's treated differently.
 23 Q. Well, if we look over at --
 24 well, strike that.

Page 174

1 If we look in the results
 2 section of the abstract, Dr. Wolf, the
 3 authors report that in African-American
 4 women, as to all other histotypes, the
 5 odds ratio was 1.05 with a confidence
 6 interval of .75 to 1.47; correct?
 7 A. That's what it says in the
 8 abstract. I'm assuming they're looking
 9 at all of those other five types combined
 10 compared to serous, not individually. I
 11 don't think they looked at them
 12 individually, because the numbers are too
 13 small to make anything of them.
 14 Q. And I'm just reading what
 15 they wrote, where in the abstract they
 16 wrote that as to all other histotypes
 17 besides high-grade serous, the odds ratio
 18 they reported was 1.05; correct?
 19 A. Yes. So that would be
 20 looking at the other five histotypes
 21 together, all of which had small numbers,
 22 and did not have a statistical difference
 23 looking at all of them together.
 24 Q. And if we just focus on

Page 175

1 their findings as to all other histotypes
 2 in African-American women, this 1.05 odds
 3 ratio with a confidence interval of .75
 4 to 1.47, do you consider that finding in
 5 this paper to show an increase in risk of
 6 ovarian cancer in the African-American
 7 women studied for these other histotypes?
 8 A. I find --
 9 MS. O'DELL: Objection.
 10 Object to the form.
 11 Go ahead.
 12 THE WITNESS: What I find is
 13 that that doesn't give me any
 14 information about the other
 15 histotypes because their numbers
 16 are so small.
 17 For instance, the clear
 18 cell, there were only 23 patients.
 19 That's not a big enough number to
 20 see an effect.
 21 BY MR. HEGARTY:
 22 Q. But if we look back over at
 23 table 2, as to all the other histotypes
 24 added up, they number more than 200

Page 176

1 cases; correct?
 2 A. Yeah, but then it's divided
 3 by 5 because it's five different
 4 histotypes. So that -- that doesn't tell
 5 me anything.
 6 Q. Would it be a fair statement
 7 then that it's not your testimony that
 8 the 1.05 finding shows an increase in
 9 risk in this study of ovarian cancer with
 10 talcum powder use for these other
 11 histotypes studied?
 12 A. No, I --
 13 MS. O'DELL: Objection to
 14 the form.
 15 THE WITNESS: What I would
 16 say is that there's not enough
 17 information to know about the
 18 other histotypes in this paper --
 19 BY MR. HEGARTY:
 20 Q. Do you believe that's true
 21 -- I'm sorry. I'm sorry to interrupt.
 22 A. -- because the numbers of
 23 individually are too small.
 24 Q. As part of your Bradford

Page 177

1 Hill analysis, you considered
 2 dose-response or biologic gradient;
 3 correct?
 4 A. Yes.
 5 Q. You consider dose-response
 6 or a biologic gradient to be an important
 7 factor in the Bradford Hill analysis;
 8 correct?
 9 MS. O'DELL: Object to the
 10 form.
 11 THE WITNESS: It is one of
 12 the factors, yes.
 13 BY MR. HEGARTY:
 14 Q. Certainly whether there is a
 15 dose-response between an exposure and a
 16 disease is a consideration of whether
 17 there is causation between the exposure
 18 and disease; correct?
 19 A. It is one of the
 20 considerations, yes.
 21 Q. Did the Davis 2022 study
 22 look at dose-response or biologic
 23 gradient between talc use and ovarian
 24 cancer?

Page 178

1 A. They did in a manner. In
 2 table 5, they looked at no use versus
 3 less than or 20 years' use versus more
 4 than 20 years' use.
 5 Q. They also looked at
 6 frequency of use in table 4; correct?
 7 A. Yes.
 8 Q. Did you consider those
 9 findings from table 4 and table 5 in
 10 preparing your most recent amended
 11 report?
 12 A. I did.
 13 Q. Do you report the Davis
 14 study's findings as to dose-response or
 15 biologic gradient anywhere in your
 16 November 2023 report?
 17 A. I did not. That was not
 18 what I put in my report, no.
 19 Q. Why did you not discuss
 20 either here or in your Bradford Hill
 21 discussion about dose-response the
 22 dose-response findings from the Davis
 23 study?
 24 MS. O'DELL: Object to the

Page 179

1 form.
 2 THE WITNESS: So a couple of
 3 things about dose-response in
 4 talcum powder use and ovarian
 5 cancer. Some of the other studies
 6 do show a gradient with frequency
 7 or number of lifetime doses. The
 8 duration is sometimes hard to get
 9 out of people, but lots of doses,
 10 you assume over a long time.
 11 But one of the questions
 12 that I always have in my head is
 13 that what is a dose? You know, we
 14 know that Tylenol comes in 325 or
 15 650 milligrams or a thousand
 16 milligrams. I'm not sure what a
 17 dose of talcum powder is.
 18 And so I think it's a little
 19 bit more challenging to show every
 20 time a dose-response effect based
 21 on frequency or duration of dose.
 22 This study, they did not
 23 find it. Some of the other
 24 studies do. Again, what's the

Page 180

1 dose of powder? It's not a
 2 medicine.
 3 BY MR. HEGARTY:
 4 Q. But you do report in your --
 5 you do reference in your report studies
 6 finding a dose-response; correct?
 7 A. Some of them, yes.
 8 Q. And is it not proper to show
 9 -- to also reference studies like Davis
 10 that show no dose-response?
 11 MS. O'DELL: Object to the
 12 form.
 13 THE WITNESS: I think what I
 14 wrote was proper.
 15 BY MR. HEGARTY:
 16 Q. Looking over at table -- I'm
 17 sorry. Looking over at page 1663 --
 18 hopefully we're on the same paging --
 19 A. We are this time. The
 20 discussion or the results?
 21 Q. Yes, the results section --
 22 in the left-hand column towards the
 23 bottom, the bottom two paragraphs, the
 24 authors report that there was no

Page 181

1 difference in the association by
 2 frequency of genital powder use or also
 3 by duration of genital powder use;
 4 correct?
 5 A. I see that, yes.
 6 Q. Do you agree with those
 7 findings?
 8 A. I agree that that's what
 9 they found in the study.
 10 Q. Do you read the study
 11 results the same?
 12 MS. O'DELL: Object to the
 13 form.
 14 THE WITNESS: What is the
 15 question?
 16 BY MR. HEGARTY:
 17 Q. Do you believe the study
 18 results as to frequency and duration, as
 19 the authors state, don't show a
 20 dose-response?
 21 A. I'll repeat my answer that
 22 in this study they found no association
 23 between frequency and duration and
 24 effect.

Page 182

1 Q. And do you agree with -- do
 2 you agree that that's what the data show?
 3 A. That's what I just said,
 4 yes. That's what this paper shows.
 5 Q. Looking over at table 4, it
 6 refers to frequency of use as greater
 7 than once a week versus less than once a
 8 week. Is that an acceptable measure of
 9 looking at frequency of use as a
 10 dose-response?
 11 MS. O'DELL: Objection to
 12 form.
 13 THE WITNESS: So I don't
 14 know what is, quote, acceptable.
 15 That is what they used in this
 16 study. There's not a -- a -- any
 17 qualified standard, as it's not a
 18 medication. It's a lifestyle
 19 factor, so there's no directions
 20 --
 21 BY MR. HEGARTY:
 22 Q. If we -- I'm sorry.
 23 A. This is what they chose to
 24 look at in this study.

Page 183

1 Q. If we focus on the
 2 high-grade serous findings in table 4 in
 3 African-American women, the authors did a
 4 statistical comparison test and found no
 5 statistically significant difference
 6 between greater than once a week and less
 7 than once a week use; correct?
 8 A. I'm just looking at the
 9 results. So high-grade serous,
 10 African-American, less than once per
 11 week, still .68. So they did not find a
 12 difference, but those women who used it
 13 more than once a week did have a
 14 statistically significant increased risk.
 15 Q. But in terms of the
 16 comparison made for dose-response
 17 purposes, a finding of .68 means that
 18 statistically, there was no difference
 19 between the 1.18 and the 1.34 number;
 20 correct?
 21 A. That's what they found in
 22 this study; but again, if you look at the
 23 actual data for more than once per week,
 24 it was statistically significant.

Page 184

1 Q. If we look over at the data
 2 for all subtypes in African-American
 3 women where it goes --
 4 MS. O'DELL: The first
 5 column, Mark? Just to make sure
 6 I'm on the right --
 7 MR. HEGARTY: Well, we're on
 8 the last column, all histotypes --
 9 MS. O'DELL: All other?
 10 THE WITNESS: All other
 11 histotypes.
 12 BY MR. HEGARTY:
 13 Q. All other histotypes -- the
 14 between less than once a week -- I'm
 15 sorry. Let me start over again.
 16 Are you at the column of all
 17 other histotypes in African-American
 18 women?
 19 A. In table 4, yes.
 20 Q. In that table, it lists the
 21 relative risk as 1.21 for less than once
 22 a week and 1.02 for greater than once a
 23 week; correct?
 24 A. That's what it says. Again,

Page 185

1 this goes to the problem that we were
 2 discussing before with this looking at
 3 all other histotypes. It's five
 4 histotypes, all with small numbers. I
 5 don't make much of that data and, to me,
 6 it makes sense why it doesn't show any
 7 effect, because we're looking at 23 clear
 8 cell and 22 low-grade endometrial and 40
 9 mucinous and 51 endometrioid all mixed up
 10 together, plus 80 others.
 11 So I would say that -- I
 12 don't think I can make anything from that
 13 information there.
 14 Q. But just based on the odds
 15 ratios reported, the risk goes down in
 16 African-American women for all other
 17 histotypes in women who use it more than
 18 once a week; correct?
 19 A. That is not how I interpret
 20 that data. I interpret that data as,
 21 it's five different histotypes, all with
 22 a small amount. I wouldn't put any
 23 weight on that data there. I would say
 24 it's not important. It doesn't answer

Page 186

1 the question, so I -- I think it doesn't
 2 answer the question about either
 3 frequency or duration.
 4 Q. If we go in -- if we go down
 5 to table 5 that looks at duration of use
 6 -- are you at that table?
 7 A. I am.
 8 Q. -- looking at the odds
 9 ratios reported for high-grade serous --
 10 A. Yes.
 11 Q. -- in African-American women
 12 with less than 20 years' use, the rate
 13 reported is 1.53, the odds ratio reported
 14 for African-American women who used talc
 15 for greater than 20 years was 1.19.
 16 Do you see that?
 17 A. I do.
 18 Q. As you reported with regard
 19 to frequency of use, does not that show
 20 that the longer you use talc, the lower
 21 your risk of ovarian cancer?
 22 A. No, and that's not what I
 23 said about frequency either. I said that
 24 in the frequency, the more common use --

Page 187

1 or more than once a week per use was
 2 significantly significant.
 3 In both of these cases, the
 4 differences between the two were not
 5 statistically significant.
 6 Q. What is your take-away from
 7 the odds ratios we just talked about of
 8 the relative risk being 1.53 for
 9 high-grade serous in African-American
 10 women for less than 20 years and 1.19 in
 11 African-American women with high-grade
 12 serous for talc use more than 20 years?
 13 Does that not show an inverse
 14 dose-response?
 15 A. No.
 16 Q. Why not?
 17 A. Because it's not -- it's not
 18 statistically different.
 19 Q. Regardless, though, the
 20 authors reported there was no
 21 dose-response as to duration or frequency
 22 for use in both African-American women
 23 and white women; correct?
 24 A. That's what they found in

Page 188

1 this paper.
 2 Q. And as to duration of use,
 3 is that an appropriate measure of -- to
 4 look at dose-response in your opinion?
 5 A. As I stated before, there
 6 isn't a standard duration of use, but
 7 you're talking about the 20 -- less than
 8 20 years or greater than 20 years?
 9 That's what they chose in this study.
 10 Less than 20 years could be
 11 one year, 19 years. So I -- I don't know
 12 what -- there's no standard.
 13 Q. One of the authors on the
 14 paper is Patricia Moorman. Do you know
 15 her?
 16 A. I don't know her.
 17 Q. Are you aware that she is
 18 also an expert in the MDL for plaintiffs?
 19 A. I am.
 20 Q. Have you ever reviewed her
 21 reports in the MDL?
 22 A. I think I did in the past.
 23 Q. Looking at the -- if you
 24 turn over to the authors' disclosure on

Page 189

1 page 1667 --
 2 A. Okay. I'm there.
 3 Q. Please tell me when you're
 4 there.
 5 A. I am.
 6 Q. -- Dr. Moorman reports in
 7 that section personal fees from law firms
 8 outside the submitted work.
 9 Do you see where I'm
 10 reading?
 11 A. I do.
 12 Q. In your opinion, is that a
 13 sufficient conflict of interest
 14 disclosure regarding her expert witness
 15 work for plaintiffs in talc cases?
 16 A. To me, I'm reading it that
 17 she's involved in litigation and it seems
 18 appropriate in this journal, Cancer
 19 Epidemiology, Biomarkers & Prevention,
 20 which is a good journal, thought it was
 21 an adequate disclosure, so I would say
 22 yes.
 23 Q. If you were an author on
 24 this paper, would you be satisfied with

Page 190

1 this same disclosure for you?

2 A. I'm not sure what I would

3 put. I would definitely disclose that I

4 was getting fees for -- from a law firm,

5 but I don't know how I would word it, but

6 I think this is appropriate what she put.

7 Q. Can a reader determine from

8 this disclosure that the fees that Dr.

9 Moorman received from law firms was

10 related to expert witness work in talcum

11 powder cases?

12 A. It doesn't specifically say

13 that.

14 Q. If you didn't -- if a

15 colleague of yours didn't know that Dr.

16 Moorman was an expert or has been an

17 expert in talcum powder cases, would they

18 in any way know that the law firm that

19 she received fees for was for talcum

20 powder cases?

21 A. Not from this disclosure.

22 If I were reading this and I had

23 questions, I would also look at the

24 author's contributions to see what Dr.

Page 191

1 Moorman contributed, which is the very

2 next section of the paper, and it says

3 that she did review and editing of the

4 writing.

5 So she didn't -- she didn't

6 design the study. She didn't analyze the

7 study. She just helped review and edit

8 the paper written by Dr. Davis.

9 Q. In your opinion, does a

10 conflict of interest disclosure depend on

11 the involvement of the author in the

12 preparation of the paper? That is, is it

13 different based on what your

14 participation is?

15 MS. O'DELL: Objection to

16 the form.

17 THE WITNESS: No, but I

18 would be more concerned if

19 somebody designed the study and it

20 was funded by an outside entity

21 that might have some influence on

22 the authors. But I don't see any

23 of that in this paper.

24 MR. HEGARTY: We've been

Page 192

1 going about another hour and ten.

2 Why don't we go off the record.

3 MS. O'DELL: Okay.

4 THE WITNESS: Okay.

5 (A recess was taken from

6 2:18 p.m. to 2:33 p.m.)

7 MR. HEGARTY: We are back on

8 the record. We left off talking

9 about the addition to your report

10 -- the addition to your report of

11 the -- of references to the Davis

12 and Woolen study.

13 I'd like to next talk about

14 the Woolen study, which I'll

15 designate for today's deposition

16 as Exhibit No. 13.

17 - - -

18 (Deposition Exhibit No.

19 Wolf-13, "Association Between the

20 Frequent Use of Perineal Talcum

21 Powder Products and Ovarian

22 Cancer: a Systematic Review and

23 Meta-analysis" Paper by Woolen, et

24 al, was marked for

Page 193

1 identification.)

2 - - -

3 BY MR. HEGARTY:

4 Q. Doctor, I believe you say

5 you have a copy of that study with you;

6 is that correct?

7 A. That's correct.

8 Q. Did you find this study

9 yourself?

10 A. This one, I do believe I did

11 find myself, but I don't recall

12 specifically.

13 Q. One of the authors, Rebecca

14 Smith-Bindman, is also an expert witness

15 for plaintiffs in talcum powder cases.

16 Are you aware of that?

17 A. Yes.

18 Q. Have you ever met Dr.

19 Smith-Bindman?

20 A. I did meet Dr. Smith-Bindman

21 in 2021.

22 Q. Did you meet her in

23 connection with you both testifying at

24 the Kleiner trial?

Page 194

1 A. Yes.
 2 Q. Did you talk to her about
 3 her opinions at that trial site?
 4 A. Yes. In general, yes.
 5 Q. Did you read her -- did you
 6 ever read her testimony at the Kleiner
 7 trial?
 8 A. I don't remember if I did or
 9 not. No, I don't think I did.
 10 Q. Are you aware that she
 11 performed the study that we're looking at
 12 in Exhibit No. 13 in connection with her
 13 serving as an expert witness in that
 14 Kleiner case?
 15 MS. O'DELL: Objection to
 16 the form; misstates the record --
 17 excuse me -- misstates the
 18 evidence.
 19 THE WITNESS: I'm sorry.
 20 Ask the question again?
 21 BY MR. HEGARTY:
 22 Q. Sure. Are you aware that
 23 she performed the study we're looking at
 24 in Exhibit No. 13 as part of her work as

Page 195

1 serving as an expert in the Kleiner
 2 trial?
 3 MS. O'DELL: Objection to
 4 the form; misstates the evidence.
 5 THE WITNESS: I'm aware that
 6 she -- no, I was not aware that
 7 she did it in conjunction with
 8 that -- that activity. Are you --
 9 yeah --
 10 BY MR. HEGARTY:
 11 Q. Do you agree that --
 12 A. What I'm hearing you ask me
 13 is did she do this study just because of
 14 that trial and I'm not aware of anything
 15 like that.
 16 Q. Do you agree that Dr.
 17 Smith-Bindman's involvement as an expert
 18 in talcum powder cases is proper to
 19 disclose in a paper like this?
 20 A. It's proper to disclose that
 21 she's receiving money from a law firm,
 22 yes.
 23 Q. That should go in a conflict
 24 of interest section; correct?

Page 196

1 A. Yes.
 2 Q. The authors of this study
 3 did use data from the O'Brien 2020 cohort
 4 study; correct?
 5 MS. O'DELL: Objection to
 6 the form.
 7 THE WITNESS: Can you show
 8 me where you're looking at that?
 9 MR. HEGARTY: Table 2.
 10 MS. O'DELL: Can you please
 11 repeat your question?
 12 BY MR. HEGARTY:
 13 Q. Did the authors of this
 14 study use data from the O'Brien 2020
 15 cohort study?
 16 A. So it says that O'Brien did
 17 not publish on daily exposure, but these
 18 data were available and Dr. O'Brien
 19 provided these for inclusion.
 20 So this was not in her
 21 previous study. It was data from the
 22 Nurses' Health Study that she had.
 23 Q. This was unpublished data,
 24 as you said; correct?

Page 197

1 A. This was unpublished data
 2 from the Nurses' Health Study, yes.
 3 Q. And it was data, unpublished
 4 data, that looked -- that was only as to
 5 patients in the study -- or only as to
 6 members in the study who used talc on a
 7 daily basis; correct?
 8 A. Who reported daily use.
 9 Q. It was also only as to women
 10 who had intact fallopian tubes; correct?
 11 MS. O'DELL: Objection to
 12 the form.
 13 THE WITNESS: I'm just
 14 looking at the eligibility.
 15 MS. O'DELL: Mark, while
 16 she's looking, is Woolen marked as
 17 Exhibit 11 -- or -- 13?
 18 MR. HEGARTY: 13.
 19 MS. O'DELL: Thank you.
 20 THE WITNESS: It doesn't
 21 specifically say in the result --
 22 or in the eligibility criteria
 23 that it's women with patent
 24 fallopian tubes. I'm looking at

Page 198

1 the numbers to try to add them up,
 2 because in the supplemental table
 3 1, they looked at women both with
 4 and without intact fallopian tubes
 5 or genital tracts.
 6 BY MR. HEGARTY:
 7 Q. But as to the results they
 8 reported, if you look over at table 2 in
 9 the footnote, in the footnote, note 5 --
 10 A. Oh, yes. I'm sorry. It
 11 does say that there on the footnote, yes
 12 --
 13 Q. That they included women
 14 with intact fallopian tubes; correct?
 15 A. To harmonize with other
 16 publications, that's correct.
 17 Q. So in the end, the data that
 18 the authors used from the O'Brien 2020
 19 study was a small subset of the overall
 20 data; correct?
 21 MS. O'DELL: Objection.
 22 THE WITNESS: So it wasn't
 23 from the O'Brien study. It was
 24 from the Nurses' Health Study --

Page 199

1 it was data from the Nurses'
 2 Health Study that wasn't in the
 3 O'Brien study that they used.
 4 BY MR. HEGARTY:
 5 Q. But in terms of the O'Brien
 6 paper --
 7 A. This was not included in the
 8 -- it wasn't included -- these patients
 9 weren't included in the O'Brien paper.
 10 Q. But of the data that they
 11 included or used from the O'Brien 2020
 12 study, it was only the unpublished data
 13 of women with patent tubes; correct?
 14 MS. O'DELL: Object to the
 15 form.
 16 THE WITNESS: So the data in
 17 this paper was from the Nurses'
 18 Health Study that O'Brien had that
 19 she did not put in her paper and
 20 these were women who had daily use
 21 of talcum powder and intact
 22 fallopian tubes.
 23 BY MR. HEGARTY:
 24 Q. As we see in table 2, the

Page 200

1 studies that were used for purposes of
 2 this paper had different measures of
 3 frequency of use; correct?
 4 A. They did.
 5 Q. In the methods section, the
 6 eligibility criteria was that the
 7 frequency needed to be greater than two
 8 times a week; correct?
 9 A. That's what they chose to
 10 determine as frequent use, yes.
 11 Q. If you look over in the
 12 results section, the second paragraph,
 13 there, they report the range of frequent
 14 talcum powder use was defined as four to
 15 seven times per week.
 16 Do you see that?
 17 MS. O'DELL: Objection to
 18 the form.
 19 THE WITNESS: That's what
 20 they found in the papers that were
 21 published.
 22 BY MR. HEGARTY:
 23 Q. Well, can you explain the
 24 difference -- can you reconcile between

Page 201

1 the methods section and the results
 2 section as between greater than two and
 3 four to seven per week?
 4 A. Well, four to seven is
 5 greater than two. They defined that they
 6 weren't going to include any that had
 7 less than two times a week and what they
 8 found was, on average, the studies that
 9 had two times a week or more had four to
 10 seven times a week.
 11 One is what they defined as
 12 their minimum amount and then the results
 13 are what they actually found.
 14 Q. If you look over in
 15 supplemental table 1 --
 16 A. Yes, I have it in front of
 17 me.
 18 Q. -- it reports that as to all
 19 women with patent fallopian tubes, a
 20 relative risk -- I'm sorry. As to less
 21 frequent -- let me start over again.
 22 As to all women with patent
 23 tubes, they reported a hazard ratio of
 24 1.04 nonstatistically significant for

Page 202

1 less frequent users.
 2 Do you see that?
 3 A. Say that sentence again? I
 4 wasn't following what you said.
 5 Q. Sure. In supplemental table
 6 1, as to all women with patent tubes --
 7 A. Women with patent fallopian
 8 tubes, okay.
 9 Q. -- the hazard ratio was 1.04
 10 nonstatistically significant. Do you see
 11 that?
 12 A. For less frequent users, I
 13 see that.
 14 Q. Is that a valid conclusion
 15 to apply to women who were less frequent
 16 talc users?
 17 MS. O'DELL: Objection to
 18 the form.
 19 THE WITNESS: That's what
 20 they found in this study. And
 21 their definition of less than --
 22 less frequent users was less than
 23 two times a week.
 24 BY MR. HEGARTY:

Page 203

1 Q. And as to all women in table
 2 2, as to less frequent talc users, the
 3 odds ratio was .96 with a confidence
 4 interval of .84 to 1.10.
 5 Do you see that?
 6 MS. O'DELL: I'm sorry.
 7 Okay. We're back in the main
 8 study at table 2?
 9 MR. HEGARTY: No, still
 10 supplemental table 1.
 11 MS. O'DELL: You said table
 12 2. That's why I was confused --
 13 MR. HEGARTY: I'm sorry.
 14 MS. O'DELL: So if you don't
 15 mind restating the question --
 16 MR. HEGARTY: Sure.
 17 MR. O'DELL: -- make sure
 18 we're in the right place.
 19 BY MR. HEGARTY:
 20 Q. Looking at supplemental
 21 table 1, as to all women, the odds ratio
 22 of less frequent users was .96; is that
 23 correct?
 24 A. That's what it says, yes.

Page 204

1 Q. Is that a 4 percent
 2 protective or decreased effect for less
 3 frequent users?
 4 MS. O'DELL: Object to the
 5 form.
 6 THE WITNESS: So that's very
 7 close to 1. I would say that that
 8 -- that number -- and it crosses 1
 9 -- found in that -- they found a
 10 nonstatistically difference,
 11 either positive or negative.
 12 BY MR. HEGARTY:
 13 Q. Looking at the conclusion
 14 section of the abstract on page 1, the
 15 authors state: This reviews suggests an
 16 increased risk of ovarian cancer
 17 associated with frequent perineal powder
 18 exposure of 31 to 65 percent.
 19 Do you see where I'm
 20 reading?
 21 A. I do.
 22 Q. Do you agree with that
 23 conclusion?
 24 A. I'm just looking at their

Page 205

1 results again.
 2 (Pause.)
 3 THE WITNESS: Yes, because
 4 their increased risk with the
 5 adjusted -- with the odds ratio
 6 was 1.47, with the range of 1.31
 7 to 1.65, so 31 to 65 percent.
 8 That's what they found.
 9 BY MR. HEGARTY:
 10 Q. And is that what you rely
 11 upon for -- is that what you rely upon
 12 for purposes of your opinions in this
 13 case, that finding?
 14 A. That was one -- that's one
 15 of the findings. It just supports all
 16 the other findings that -- that support
 17 my opinion. It's just one more piece of
 18 information.
 19 Q. Please turn next to page 11,
 20 the third paragraph of your report where
 21 you added a reference to the Nowak
 22 meta-analysis?
 23 A. Page 11 -- where is Nowak on
 24 there?

Page 206

1 MS. O'DELL: Page 11,
 2 midway.
 3 THE WITNESS: Oh, okay. I
 4 see it.
 5 BY MR. HEGARTY:
 6 Q. Do you have a copy of the --
 7 do you have a copy of the Nowak paper?
 8 A. I'm getting it. Give me a
 9 minute here.
 10 (Pause.)
 11 THE WITNESS: I have the
 12 Nowak 2021 paper in front of me.
 13 MR. HEGARTY: And we'll
 14 designate that paper as Exhibit 14
 15 for today's deposition.
 16 - - -
 17 (Deposition Exhibit No.
 18 Wolf-14, "Asbestos Exposure and
 19 Ovarian Cancer - A Gynaecological
 20 Occupational Disease. Background,
 21 Mandatory Notification, Practical
 22 Approach" Paper by Nowak, et al,
 23 was marked for identification.)
 24 - - -

Page 207

1 BY MR. HEGARTY:
 2 Q. Did you find that study on
 3 your own?
 4 A. I don't recall.
 5 Q. What did this study add to
 6 your opinions in this case?
 7 A. Just another study that
 8 supports asbestos can cause ovarian
 9 cancer.
 10 Q. This study pertains only to
 11 occupational asbestos exposure; correct?
 12 A. That's correct.
 13 Q. The data they included in
 14 the study was all occupational exposure
 15 to raw asbestos; correct?
 16 MS. O'DELL: Objection to
 17 the form.
 18 THE WITNESS: I don't -- I
 19 don't remember the word "raw."
 20 That's what I'm looking for here.
 21 MR. HEGARTY: Let me
 22 withdraw my question.
 23 BY MR. HEGARTY:
 24 Q. Regardless of whether they

Page 208

1 used the word "raw" or not, the study
 2 results are limited to data from
 3 occupational exposure to women working
 4 with or around asbestos; correct?
 5 A. That's correct.
 6 Q. So the involved exposure of
 7 the data looked at was through inhalation
 8 of asbestos; correct?
 9 MS. O'DELL: Objection to
 10 the form.
 11 THE WITNESS: Well,
 12 certainly it would include
 13 inhalation of asbestos.
 14 BY MR. HEGARTY:
 15 Q. None of the data that went
 16 into the results of this paper were from
 17 women using talcum powder; correct?
 18 A. That's correct.
 19 Q. Is it your opinion that any
 20 level of occupational exposure to
 21 asbestos increases the risk of ovarian
 22 cancer as reported in this study of 1.88?
 23 A. Well, I don't know what a
 24 safe level of occupational exposure would

Page 209

1 be.
 2 Q. Well, my question I think is
 3 a little bit different. Is it your
 4 opinion that any level of occupational
 5 exposure to asbestos increases the risk
 6 of ovarian cancer to the reported odds
 7 ratio in this study of 1.88?
 8 A. From this study, I don't
 9 think I can answer that question and -- I
 10 can't say that.
 11 Q. Can you cite to any data
 12 showing that women who have used talcum
 13 powder are exposed to the same levels of
 14 asbestos as the women in the studies that
 15 this Nowak paper considered?
 16 A. I'm not --
 17 MS. O'DELL: Excuse me.
 18 Objection to the form.
 19 THE WITNESS: I'm not aware
 20 of any study comparing the
 21 exposure of -- the level of
 22 exposure to asbestos in women
 23 using talcum powder versus
 24 occupational assessment exposure.

Page 210

1 I'm not aware of any.
 2 BY MR. HEGARTY:
 3 Q. Given that this paper is
 4 focused on occupational exposure to
 5 asbestos, how does it contribute to your
 6 opinions as it relates to women exposed
 7 perineally to talcum powder use and
 8 ovarian cancer risk?
 9 MS. O'DELL: Objection to
 10 the form.
 11 THE WITNESS: So for me,
 12 it's another paper that shows that
 13 asbestos causes ovarian cancer and
 14 I'm aware of data from Dr. Longo's
 15 previous studies, from Hopkins,
 16 from the FDA, that talcum powder
 17 causes asbestos -- I mean causes
 18 ovarian cancer.
 19 So this is just another more
 20 recent paper showing that asbestos
 21 can cause ovarian cancer, along
 22 with all the others that I've
 23 cited, including the work from
 24 IARC in 2012.

Page 211

1 BY MR. HEGARTY:
 2 Q. Your references that we
 3 looked at earlier include a recent paper
 4 on asbestos exposure and ovarian cancer
 5 by a Dr. Slomovitz. Do you recall that
 6 paper?
 7 A. Yes. That was a review
 8 paper.
 9 Q. Why did you not include a
 10 reference to Dr. Slomovitz's paper in the
 11 body of your report?
 12 A. It's a -- it's a -- what I
 13 was including here is a new study. That
 14 was not a new study. That was a review
 15 paper that I didn't feel added anything
 16 more to my opinion.
 17 Q. That paper, that is, the
 18 paper by Dr. Slomovitz, stated that the
 19 observed statistical association between
 20 asbestos and ovarian cancer is weak and
 21 inconsistent.
 22 Do you agree with that from
 23 your general review of the data?
 24 MS. O'DELL: Excuse me,

Page 212

1 Mark. Just give Dr. Wolf a moment
 2 to get Dr. Slomovitz's paper in
 3 front of her.
 4 MR. HEGARTY: Let me
 5 withdraw the question because my
 6 time is limited.
 7 BY MR. HEGARTY:
 8 Q. Putting aside Dr.
 9 Slomovitz's paper, do you agree that the
 10 data on asbestos and ovarian cancer is
 11 weak and inconsistent, including the data
 12 from the Nowak study?
 13 MS. O'DELL: Objection to
 14 the form.
 15 THE WITNESS: I do not agree
 16 with that.
 17 BY MR. HEGARTY:
 18 Q. You also reference in this
 19 paragraph the EPA in a federal register.
 20 Do you see that?
 21 A. Yes.
 22 Q. Did you find that citation
 23 yourself?
 24 A. I don't -- I don't think so.

Page 213

1 I think that the attorneys found that
 2 one.
 3 Q. What does the -- does that
 4 federal register add to your opinions in
 5 this case?
 6 A. It's just another piece of
 7 information, a regulatory agency that
 8 connects asbestos and ovarian cancer; and
 9 in fact, in that, they required reporting
 10 of any products, including talcum
 11 products, that might have asbestos in
 12 them as a risk.
 13 Q. Please turn next in your
 14 report to page 17.
 15 A. Okay.
 16 Q. Paragraph 6, you added to
 17 your citation list the Mandarino 2020
 18 study and the Emi 2021 study. Do you see
 19 that?
 20 A. Page -- not on page 17.
 21 MS. O'DELL: On page --
 22 THE WITNESS: Page 15.
 23 MR. HEGARTY: I'm sorry.
 24 Page 15, paragraph 6?

Page 214

1 THE WITNESS: Yes, the Emi
 2 and the Mandarinino study, yes.
 3 BY MR. HEGARTY:
 4 Q. Why did you add those two
 5 studies to that paragraph?
 6 A. So those were two more
 7 studies that look at how talcum powder
 8 might -- a potential mechanism for
 9 causation. Both of them were looking at
 10 activation of macrophages after exposure
 11 to talcum powder.
 12 Can you get the Mandarinino
 13 study for me, please (Indicating)?
 14 MR. HEGARTY: And can you
 15 get the Mandarinino and Emi papers,
 16 Dr. Wolf?
 17 THE WITNESS: Yes, we're
 18 working on that. Thank you.
 19 Okay. I have both Emi and
 20 Mandarinino.
 21 MR. HEGARTY: So we'll talk
 22 first about Mandarinino, which we'll
 23 mark as Exhibit No. 15 to today's
 24 deposition.

Page 215

1 - - -
 2 (Deposition Exhibit No.
 3 Wolf-15, "The effect of talc
 4 powders on phagocytes in
 5 co-culture with ovarian cancer
 6 cells" Paper by Mandarinino, et al,
 7 was marked for identification.)
 8 - - -
 9 BY MR. HEGARTY:
 10 Q. Did you find that study on
 11 your own?
 12 A. I don't remember.
 13 Q. Had you read that study as
 14 of the time of the -- as of the time you
 15 prepared your 2021 amended report?
 16 A. I don't think I had.
 17 Q. The Mandarinino study studied
 18 mouse cells; correct?
 19 A. That's correct.
 20 Q. Do mice get ovarian cancer?
 21 A. No, but they were -- they
 22 were looking at the effect on the
 23 macrophages, not the -- not ovarian
 24 cancer itself, so an immune response of

Page 216

1 the macrophages, and so that would be a
 2 way to do it in animals.
 3 There aren't very many
 4 animals that naturally get ovarian
 5 cancer, so there's very little studies.
 6 Q. Have you ever been involved
 7 or worked on any studies involving mouse
 8 cells?
 9 A. I have not. I've used new
 10 -- immunocompromised mice to give them
 11 ovarian cancer and cervix cancer, but not
 12 mouse cells.
 13 Q. With regard to macrophages
 14 in the human body, how many are there,
 15 how many macrophages does the human body
 16 have?
 17 A. Oh, gosh. I don't know the
 18 number and it probably depends on what's
 19 going on in the body how many macrophages
 20 you have.
 21 Lots. I'll say lots.
 22 Q. In women exposed to talcum
 23 powder, what percentage of macrophages
 24 come into contact with talcum powder?

Page 217

1 MS. O'DELL: Object to the
 2 form.
 3 THE WITNESS: I don't know
 4 that there's any data to answer
 5 that question. I'm not aware of
 6 any.
 7 BY MR. HEGARTY:
 8 Q. How did the authors in this
 9 study measure a reaction to the
 10 substances that they studied? In other
 11 words, what did they -- what was the
 12 measure?
 13 A. So they looked at increased
 14 production of reactive oxygen species and
 15 changes in the genes of the macrophages
 16 that were related to immune response.
 17 Q. The effects that they showed
 18 were also true with estradiol alone;
 19 correct?
 20 A. So my recollection is, the
 21 effects were more prominent with talc
 22 alone versus estradiol and even more
 23 prominent with talc and estradiol
 24 together.

Page 218

1 If you look at figure 2,
2 these are looking at reactive oxygen
3 stains in the three different cell lines,
4 either alone or with an inert substance,
5 which I think was titanium oxide.
6 With estrogen alone, you see
7 a little bit of effect. With talc, you
8 see a greater effect; and with talc and
9 estrogen together, you see the most
10 effect.
11 Q. And with regard to how they
12 measured reactive oxygen species, they
13 were looking at changes in gene
14 expression; correct?
15 A. This was flow cytometry, so
16 I don't think that was gene expression.
17 Q. They did not measure
18 reactive oxygen species such as H2O2, HO,
19 and O2; correct?
20 A. I don't think that's what
21 they were looking at.
22 Q. How does the effects that
23 the authors are showing here in
24 macrophages of mouse cells contribute to

Page 219

1 your opinions as relates to women using
2 talcum powder and ovarian cancer?
3 A. So macrophages in general
4 are studied in all different types of
5 species because they have a very similar
6 role in humans or mice or other animals,
7 and it's a way to in this case look to
8 see does talcum powder have an effect on
9 immune response in these mice cells.
10 And so it's a surrogate
11 that's well accepted in the scientific
12 publication world or scientific research
13 world to use macrophages from mice or
14 other species as a surrogate for human
15 macrophages.
16 And so this adds evidence
17 that talcum powder exposure has an effect
18 on the immune system activating reactive
19 oxidative species and inhibiting or
20 having changes in immune surveillance.
21 Q. One of the authors on this
22 study is Dr. Godleski. Do you see that?
23 A. I do see that.
24 Q. Do you know Dr. Godleski?

Page 220

1 A. I know of him. I have never
2 met him.
3 Q. He's also an expert in the
4 MDL for plaintiffs. Are you aware of
5 that?
6 A. Yes.
7 Q. In fact, you rely on his
8 expert reports for your opinions as to
9 Ms. Judkins and Ms. Gallardo; correct?
10 A. That's correct.
11 Q. If we turn over to his
12 expert disclosure, on page 10 under
13 "Declaration of Interest," he writes:
14 JJG has served as an independent expert
15 and provided expert testimony in talc and
16 other environmentally related litigation.
17 Do you find that to be a
18 sufficient conflict of interest
19 disclosure?
20 A. Yes.
21 MR. HEGARTY: Please turn
22 next to the Emi paper. I'll
23 designate that as Exhibit No. 16.
24 - - -

Page 221

1 (Deposition Exhibit No.
2 Wolf-16, "Transcriptomic and
3 epigenomic effects of insoluble
4 particles on J774 macrophages"
5 Paper by Emi, et al, was marked
6 for identification.)
7 - - -
8 BY MR. HEGARTY:
9 Q. Did you find this paper on
10 your own?
11 A. I don't remember.
12 Q. What does this paper add to
13 your opinions in this case?
14 A. So this is just another
15 paper looking at potential causation of
16 talc, talcum powder, to cause ovarian
17 cancer and it again -- it's looking at
18 proliferation -- excuse me -- changes in
19 macrophage activation primarily.
20 Q. This study also looked at
21 mouse cells; correct?
22 A. Yes.
23 Q. The study also refers to DNA
24 methylation. What is that?

Page 222

1 A. So it's changes in the DNA,
 2 methylating it.
 3 Q. What does methylating it
 4 mean?
 5 A. It's changing the DNA and
 6 how it might react and how it might
 7 change expression of genes.
 8 Q. Are you saying that it means
 9 -- it is looking at mutation of DNA? You
 10 said --
 11 A. No.
 12 Q. -- changes in DNA. What do
 13 you mean?
 14 A. No, so it's not mutations --
 15 MS. O'DELL: Object to the
 16 form.
 17 THE WITNESS: -- it's
 18 addition of a methyl -- I'm --
 19 methylation. It's addition of --
 20 it's addition to the DNA, not
 21 mutation of the DNA, if that's
 22 clear enough --
 23 BY MR. HEGARTY:
 24 Q. Ultimately, this paper

Page 223

1 measured gene expression after exposure
 2 to talc and titanium dioxide particles;
 3 correct?
 4 A. Right. So it was epigenetic
 5 changes they were looking at.
 6 Q. Is it your contention that a
 7 measure of gene expression can be used to
 8 predict carcinogenicity?
 9 A. It's a surrogate used in
 10 many studies.
 11 Q. And how is that surrogate --
 12 or how can that surrogate predict
 13 carcinogenicity?
 14 A. Well, if there's changes in
 15 gene expression that were epigenetic
 16 changes in the genes that could lead to
 17 activation or deactivation of genes, that
 18 can change how cells proliferate, how
 19 they grow, how they might migrate, how
 20 they might invade. And so it's a
 21 surrogate --
 22 Q. Do all those -- I'm sorry to
 23 interrupt. Please continue.
 24 A. No, it's a surrogate.

Page 224

1 Q. Do all those changes you
 2 just described always lead to a
 3 malignancy?
 4 A. No.
 5 Q. Has there been any studies
 6 showing an association between these
 7 findings and ovarian cancer risk?
 8 MS. O'DELL: Object to the
 9 form.
 10 THE WITNESS: I'm not aware
 11 that any -- are you asking about
 12 in humans?
 13 MR. HEGARTY: Yes.
 14 THE WITNESS: I'm not aware
 15 that any of those studies have
 16 been done.
 17 BY MR. HEGARTY:
 18 Q. Is that also true as to the
 19 Mandarin study, what Mandarin studied
 20 in the paper we just looked at?
 21 MS. O'DELL: Objection.
 22 THE WITNESS: So there are
 23 studies about macrophages and
 24 macrophage activation in women

Page 225

1 with ovarian cancer, so somewhat
 2 there is.
 3 But the specific epigenetic
 4 changes they found in this paper,
 5 I'm not aware of any studies on
 6 them.
 7 BY MR. HEGARTY:
 8 Q. What studies -- what study
 9 are you referencing --
 10 MS. O'DELL: Excuse me. I'm
 11 not sure she was finished.
 12 THE WITNESS: Yeah, and I'm
 13 not referencing -- I'm thinking
 14 back in my history of all the
 15 papers I've ever read and I'm
 16 pretty sure there's papers about
 17 macrophage activation in ovarian
 18 cancer, but I can't tell you the
 19 name of any paper --
 20 BY MR. HEGARTY:
 21 Q. In the Emi study, did the
 22 titanium dioxide particles also induce
 23 the same response as the talc particles?
 24 A. I'm just looking at the --

Page 226

1 at the results.
2 (Pause.)
3 THE WITNESS: So there was
4 some changes with the titanium
5 oxide, but not as much as the
6 talc.
7 BY MR. HEGARTY:
8 Q. In your opinion, does
9 titanium dioxide cause ovarian cancer?
10 A. Not that I'm aware of any
11 reports of it causing ovarian cancer.
12 Q. In a study like this, can
13 particle size have an effect on the
14 results?
15 A. You know, this is beyond my
16 area of expertise, so I'm not going to --
17 I'm going to say I don't know the answer
18 to that question.
19 Q. Please turn next to
20 paragraph 8 where you include a reference
21 to the Harper 2023 study. Do you see
22 that?
23 A. I do.
24 Q. Do you have that paper as

Page 227

1 well?
2 A. Well, I'm going to get it.
3 (Pause.)
4 THE WITNESS: I have it in
5 front of me.
6 BY MR. HEGARTY:
7 Q. And what do you rely upon in
8 this study for your opinions in this
9 case?
10 A. So this is another paper
11 supporting causation; and in this study,
12 they actually looked at the effects on
13 surface epithelium -- human surface
14 epithelium ovarian cells that are
15 immortalized.
16 So these are not cancer
17 cells. They're cells from the ovarian
18 surface that have been immortalized, so
19 they'll grow in culture, and it looks at
20 the effects of result of exposure to talc
21 on proliferation markers and on p53 and
22 Ki67 expression.
23 Q. Do you agree -- I'm sorry to
24 interrupt. Go ahead.

Page 228

1 A. So it's just another paper
2 supporting causation.
3 Q. Do you agree with the title
4 of this paper that this study showed that
5 talcum powder induces malignant
6 transformation in normal human primary
7 ovarian epithelial cells?
8 A. So that's what they titled
9 the paper. I don't have an agreement or
10 disagreement. What they found in the
11 paper was increased expression of Ki67,
12 which is a proliferation marker, showing
13 that the cells grew in response and
14 increased expression of p53, which is
15 associated with most ovarian cancers,
16 especially the serous type.
17 And so I don't know why they
18 chose the title that they chose. Again,
19 I'm neutral to it. I'm looking at the
20 results.
21 Q. Have you analyzed or
22 investigated whether a commercial
23 cellular assay kit can ever be used to
24 demonstrate malignant transformation

Page 229

1 after 72 hours?
2 A. I haven't investigated that
3 myself.
4 Q. Can you cite to any other
5 studies where the authors claim to have
6 achieved malignant transformation after
7 exposure to any substance in 72 hours?
8 A. I haven't looked that up
9 myself to know if anyone else has titled
10 their papers that way.
11 Q. Do you agree that a
12 necessary step to show the potential for
13 relevance of this paper is to conduct in
14 vivo studies in animals?
15 MS. O'DELL: Object to the
16 form.
17 THE WITNESS: You know, I
18 will just say that it's very
19 difficult -- so, as I mentioned,
20 not many animals get ovarian
21 cancer. Guinea pigs sometimes do.
22 Hen -- egg-laying hens sometimes
23 do.
24 But the only other -- the

Page 230

1 most common animal models used in
 2 ovarian cancer are not giving them
 3 -- looking at changes of their
 4 ovaries because they don't get
 5 ovarian cancer. Right?
 6 And I'm not aware of any
 7 studies that have looked at using
 8 talc or other things in the two
 9 rare animal models that there are
 10 to see if it causes ovarian
 11 cancer, so I would not expect that
 12 to or it need to be done to
 13 confirm these results.
 14 BY MR. HEGARTY:
 15 Q. Have you investigated
 16 whether any journals rejected this paper?
 17 A. No, I have not. I'm not
 18 sure how -- how I would find that out.
 19 Q. Have you been made aware of
 20 any journals rejecting this paper?
 21 A. No.
 22 Q. Are you aware that Dr. Saed
 23 has served as a paid plaintiffs' expert
 24 in the MDL litigation?

Page 231

1 A. I am.
 2 Q. Are you aware that he
 3 reports in this paper that the study was
 4 paid for by plaintiffs' counsel?
 5 A. I'm going to try to find --
 6 MS. O'DELL: Object to the
 7 form.
 8 (Pause.)
 9 THE WITNESS: Where does it
 10 say that in this paper?
 11 MR. HEGARTY: If you look
 12 over at the very end, under
 13 conflict of interest for Dr. Saed
 14 --
 15 THE WITNESS: I was looking
 16 for that. Served as a paid --
 17 paid consultant. And then
 18 funding: A portion of Dr. Saed's
 19 time conducting this research was
 20 paid for by the lawyers
 21 representing the plaintiffs.
 22 BY MR. HEGARTY:
 23 Q. Is that important
 24 information to know about this article?

Page 232

1 A. Yes, it's a piece of
 2 information and it's in the article. I
 3 mean, it's -- yeah, it's published.
 4 Q. Are you aware that Dr. Saed
 5 has produced peer reviewer comments in
 6 connection with him publishing this
 7 paper?
 8 MS. O'DELL: Object to the
 9 form.
 10 THE WITNESS: What does that
 11 mean?
 12 BY MR. HEGARTY:
 13 Q. Well, that means, are you
 14 aware that in connection with this case,
 15 the MDL, Dr. Saed has provided e-mail
 16 correspondence from the journals that he
 17 submitted this paper to that contain
 18 comments of the peer reviewers from their
 19 review of the paper? Are you aware of
 20 that?
 21 A. I'm not aware of that.
 22 Q. Would those comments be
 23 something you would be interested in in
 24 weighing the strengths and weaknesses in

Page 233

1 consideration of this paper?
 2 A. It's hard to know because I
 3 never see those for any paper that I read
 4 or assess or review.
 5 Q. Well, let me show you a
 6 couple of the comments from the reviewers
 7 that we were provided in this litigation.
 8 MS. O'DELL: So, Mark, if
 9 you're going to mark those as
 10 exhibits, I would just ask that
 11 you put them in the chat and --
 12 rather than just limit it to
 13 what's on the screen.
 14 MR. HEGARTY: I can send it
 15 to you by e-mail.
 16 MS. O'DELL: Either way, but
 17 I want Dr. Wolf to have the
 18 opportunity to see the whole
 19 document before she is asked
 20 questions.
 21 MR. HEGARTY: Let's go ahead
 22 and go off the record real quick.
 23 I'll e-mail this. Can I e-mail it
 24 to you, Leigh?

<p style="text-align: right;">Page 234</p> <p>1 MS. O'DELL: You may. But, 2 I mean, I'm not saying we're going 3 off the record. I mean, if you're 4 going to ask her questions and 5 mark an exhibit, she will look at 6 it. If it's not that long, she'll 7 answer your questions. If she 8 needs a few more minutes, then we 9 can go off the record. 10 But I just want to -- it's 11 not clear -- if we don't have a 12 paper copy here and you show a 13 limited version -- I'm not being 14 pejorative about that, there's 15 just a limited amount of screen -- 16 she can't see the whole thing and 17 I think that's important. And 18 that's been important all day in 19 every sense. 20 So if you want to mark 21 something, just send it to me. 22 She can look at it while we're -- 23 and then she'll be prepared to 24 answer your questions.</p>	<p style="text-align: right;">Page 236</p> <p>1 response. 2 BY MR. HEGARTY: 3 Q. Doctor, do you see the 4 document I'm showing on my screen? 5 A. I see the little bit that 6 you're showing. I would like to see the 7 whole document. 8 MR. HEGARTY: Understood. 9 I'll designate this as Exhibit No. 10 18. 11 - - - 12 (Deposition Exhibit No. 13 Wolf-17, "Talcum powder induces 14 malignant transformation in normal 15 human primary ovarian epithelial 16 cells" Paper by Harper, et al, was 17 marked for identification.) 18 - - - 19 (Deposition Exhibit No. 20 Wolf-18, PLOS ONE Reviewer 21 Comments, SAED_SEPT222021_ 22 SUPPL_000100 through 23 SAED_SEPT222021_SUPPL_000104, was 24 marked for identification.)</p>
<p style="text-align: right;">Page 235</p> <p>1 MR. HEGARTY: Well, let's 2 try this, because I think we can 3 do this without sharing. 4 BY MR. HEGARTY: 5 Q. Doctor, do you see the 6 document I'm showing you on my screen? 7 MS. O'DELL: And, Mark, 8 you're going to e-mail it to me? 9 MR. HEGARTY: Well, I tried 10 and it wasn't -- it was not going. 11 MS. O'DELL: Yeah, if you -- 12 you can e-mail it to me I think if 13 you just do share, send an e-mail. 14 MR. HEGARTY: Oh, I know 15 that. 16 MS. O'DELL: Okay. 17 MR. HEGARTY: It's not 18 letting me do it. 19 MS. O'DELL: That's -- if we 20 can't see the document, she can't 21 adequately respond to your 22 questions. 23 MR. HEGARTY: Well, I'll let 24 her answer that if that's her</p>	<p style="text-align: right;">Page 237</p> <p>1 - - - 2 BY MR. HEGARTY: 3 Q. And as you mentioned, you 4 have not seen reviewer comments to Dr. 5 Saed's paper; correct? 6 A. I have not. 7 Q. I'm going to scroll down to 8 the section under major comments. Do you 9 see the section I'm -- under the heading 10 "Major Comments"? 11 MS. O'DELL: Excuse me. I 12 object to this line of 13 questioning. Dr. Wolf has asked 14 to see it and, Mark, you can just 15 -- you can just e-mail it to us. 16 I don't -- that's available in my 17 PDF program. I'm sure it is for 18 you, too. 19 I actually wonder if you use 20 the little paperclip on the side 21 of your screen there, you probably 22 can e-mail it, but Dr. Wolf is 23 entitled to see it. 24 Now, you can also, which I'm</p>

Page 238

1 so happy for you to do this, put
 2 it in the chat and you can -- put
 3 it in the chat and then Dr. Wolf
 4 is free to pull it up on her
 5 computer and look at it and
 6 certainly would be happy to answer
 7 your questions.
 8 MR. HEGARTY: Leigh, I know
 9 you have this document already, so
 10 I think it's -- I think it's kind
 11 of disingenuous for you to ask me
 12 -- or present an obstacle to me
 13 using this document and asking me
 14 to send it to you when you have
 15 this document.
 16 MS. O'DELL: Well, Mark, to
 17 be perfectly fair -- and I won't
 18 say you're being disingenuous.
 19 I'm going to not say that. I'm
 20 going to try to just be clear --
 21 there are thousands of documents
 22 that have been produced in this
 23 litigation, and Dr. Wolf is
 24 prepared to answer your questions,

Page 239

1 but this is not a document that is
 2 on her materials list and if you
 3 want her to answer questions about
 4 it, you need to provide it.
 5 That's all I'm asking. I
 6 think it's perfectly fair.
 7 MR. HEGARTY: You already
 8 have a copy of it, so let's
 9 continue.
 10 MS. O'DELL: No, absolutely,
 11 she is not answering questions
 12 about this --
 13 MR. HEGARTY: You're going
 14 to instruct her not to answer?
 15 MS. O'DELL: I'm going to --
 16 I'm asking you, actually, to
 17 provide a copy of the document to
 18 me.
 19 You're super-sophisticated.
 20 You're able to do that. You can
 21 do it through the chat or you can
 22 send me an e-mail and we can get
 23 it on Dr. Wolf's screen. She can
 24 have an opportunity to review it

Page 240

1 in totality.
 2 It's a five-page document,
 3 single-spaced, with a lot of data
 4 on it and this is a very
 5 complicated subject.
 6 And for you to want to put
 7 up a very small amount and
 8 cherry-pick the comments without
 9 giving her opportunity to
 10 understand the context, I just
 11 think it's unfair.
 12 And so, again, send it to
 13 Dr. Wolf by the chat. Send it to
 14 me by e-mail, I'll get it to her,
 15 happy to answer your questions.
 16 MR. HEGARTY: Let's go off
 17 the record. Let's go off the
 18 record because -- let's go off the
 19 record.
 20 - - -
 21 (A discussion off the record
 22 occurred.)
 23 - - -
 24 MS. O'DELL: I would like to

Page 241

1 go back on the record, Kim, so I
 2 can put this on the record. Thank
 3 you so much.
 4 Mark, what you're asking is
 5 to put a limited portion of a
 6 five-page dense document before
 7 Dr. Wolf and ask her something,
 8 without giving her the opportunity
 9 to review the document in
 10 totality. She's entitled to that.
 11 This is not on her materials
 12 considered list and if she's going
 13 to be shown something that's not
 14 on her materials considered list,
 15 then that's the only fair way to
 16 do it.
 17 Every other study that
 18 you've asked her about that's on
 19 her list, she has a copy here,
 20 she's been ready to go.
 21 So if you want to pursue
 22 this inquiry, please, you're
 23 entitled to do that, but you're
 24 not entitled to do it in a way

<p style="text-align: right;">Page 242</p> <p>1 that's unfair to Dr. Wolf and 2 that's point I'm making. 3 MR. HEGARTY: Well, the 4 procedure you're talking about is 5 one that's going to, for her just 6 to review the document, take a 7 half an hour to review. 8 MS. O'DELL: I don't know 9 that she would do that, but she's 10 entitled to look at it in context. 11 And to be fair, you know, 12 we're here by Zoom. We were 13 willing to be -- have you here in 14 person. If we were here in 15 person, you would have handed Dr. 16 Wolf a copy of the document. 17 Obviously, it's more convenient 18 for you to do it by Zoom. We're 19 happy to accommodate that. 20 There's no problem. 21 But under those 22 circumstances, we need to have the 23 documents that are going to be 24 marked in their totality and --</p> <p style="text-align: right;">Page 243</p> <p>1 MR. HEGARTY: So it's your 2 position, I want to make it clear, 3 that if we don't provide a 4 document to you, either in advance 5 or at the deposition, that the 6 doctor does not have with them, 7 then you will instruct the doctor 8 not to respond to questions. 9 MS. O'DELL: That's not what 10 I'm saying. And we have had many 11 instances in this litigation where 12 there's been a document that's 13 been subject to inquiry and the 14 lawyer for Johnson & Johnson has 15 put it in the chat if it wasn't 16 something the witness had before 17 them. 18 That's so reasonable. I'm 19 asking for something that has been 20 done consistently -- you're saying 21 -- you either refuse to put it in 22 the chat, you refuse to e-mail it, 23 or you're incapable. I don't 24 think you're incapable. I've been</p>	<p style="text-align: right;">Page 244</p> <p>1 working with you a long time. 2 And so that's the issue. 3 MR. HEGARTY: Well, I think 4 that's an inappropriate approach, 5 but if we're going to do that, 6 I'll e-mail those to you, but 7 we're -- and the review needs to 8 be -- needs to be off the record, 9 not on the record. 10 MS. O'DELL: Well, send them 11 to us. She'll pull them up. If 12 she needs more time, Dr. Wolf is 13 -- will let you know she needs 14 more time to review it. 15 MR. HEGARTY: Well, the 16 documents we are talking about 17 are, as you said, around five 18 pages. You've seen them. You 19 know that it's going to take -- if 20 you're insisting that she read the 21 entirety of it, it's going to take 22 several minutes. 23 MS. O'DELL: Well, Mark, 24 just send them and she'll look at</p> <p style="text-align: right;">Page 245</p> <p>1 and Dr. Wolf, if she believes she 2 needs more time, she will let you 3 know and we'll go off the record, 4 but just send them to us. 5 The reason I said five pages 6 is that's what you had up, was a 7 five-page document. I don't know 8 what you had pulled up. I only 9 saw a small portion of it either, 10 have no context for it, and it's 11 certainly not something I have a 12 hard copy of it here. 13 So again, provide them, Dr. 14 Wolf can look. If she needs more 15 time, so be it. If she doesn't, 16 she'll answer your questions. 17 MR. HEGARTY: Let's go off 18 the record and I'll e-mail those 19 to you. Off the record. 20 MS. O'DELL: We'll take two 21 minutes. 22 - - - 23 (A discussion off the record 24 occurred.)</p>
---	--

Page 246

1 - - -
 2 (A recess was taken from
 3 3:21 p.m. to 3:39 p.m.)
 4 MR. HEGARTY: We are back on
 5 the record.
 6 The first -- the document I
 7 want to look at is the one
 8 beginning with Bates number 100.
 9 That's a five-page document, which
 10 I'll designate as Exhibit 18.
 11 BY MR. HEGARTY:
 12 Q. Do you have that document in
 13 front of you?
 14 A. Yeah, that's the one that's
 15 from PLOS ONE, P-L-O-S ONE?
 16 Q. Yes. Under the section
 17 under major comments over on page 101, if
 18 you look at comment number 3 --
 19 A. Yes.
 20 Q. -- do you agree with that
 21 statement -- or those statements in that
 22 comment?
 23 A. The abstract, the authors
 24 state the finding represents a direct

Page 247

1 causation and mechanism of talcum powder
 2 exposure. Colony formation does not show
 3 molecular mechanism of action. At best,
 4 it describes the end product of a
 5 mechanism of action. Please revise.
 6 And did he revise it?
 7 Because that was not where it was --
 8 Q. Well, let me ask it this
 9 way: Do you agree that --
 10 MS. O'DELL: Excuse, Mark.
 11 I think she was continuing to
 12 answer your question.
 13 THE WITNESS: Yeah. What
 14 number was it? Number --
 15 MS. O'DELL: Number 3.
 16 MR. HEGARTY: 3.
 17 THE WITNESS: Okay.
 18 So colony formation is a
 19 surrogate again for proliferation
 20 -- it's not a surrogate for
 21 proliferation, but a surrogate for
 22 transformation. So, you know, I
 23 think that's a reasonable concern
 24 that this reviewer offered.

Page 248

1 BY MR. HEGARTY:
 2 Q. Look next at number 4:
 3 Based on the minimal amount of data
 4 provided in this manuscript, the author's
 5 conclusion suggesting acute exposure to
 6 talc powder to ovary epithelial cells is
 7 associated with ovarian cancer are
 8 outrageous and not supported by the
 9 manuscript's data.
 10 Do you agree with that
 11 statement?
 12 A. I think that's the -- that's
 13 this reviewer's review and comment on the
 14 paper. I don't agree with it.
 15 Q. Does it cause you any
 16 concern that a reviewer of the -- as part
 17 of the peer review process found that Dr.
 18 Saed's conclusions are outrageous?
 19 MS. O'DELL: Object to the
 20 form.
 21 THE WITNESS: Not -- not on
 22 its own. I will tell you that
 23 most papers, when you go to
 24 publish them, the vast majority

Page 249

1 are rejected by the first -- first
 2 journal that they're submitted to
 3 and I am -- other than comments on
 4 my own papers that I've submitted
 5 that have either been accepted or
 6 rejected, I'm not privy to what
 7 other reviewers say, so I can't
 8 really comment on the importance
 9 of that comment.
 10 BY MR. HEGARTY:
 11 Q. Will you consider that
 12 comment in your weight of the paper as it
 13 relates to your opinions in this case?
 14 A. I don't think it's fair to
 15 because it has nothing to do with -- this
 16 paper was published in a peer-reviewed
 17 journal. This is not anything that I
 18 would have privy to for any of the other
 19 papers that I've read or any other papers
 20 that I've -- I have read for other
 21 reasons in my career, so to me it's,
 22 like, not relevant.
 23 Q. Look next at paragraph 5 in
 24 that same section. There's a statement

<p style="text-align: right;">Page 250</p> <p>1 in that paragraph that says: Soft agar 2 colony formation alone in an in vitro 3 test system is not enough data to claim 4 malignant transformation. 5 Do you agree with that 6 statement? 7 A. It supports it. It supports 8 malignant transformation. Personally, I 9 wouldn't claim that it caused malignant 10 transformation, but again, I can't query 11 on Dr. Harper's title for her paper. 12 Q. Looking at another -- at a 13 couple sentences away from that, that 14 sentence reads: To show neoplastic 15 transformation, the authors would need to 16 conduct a more diverse battery of tests 17 to show that these transformed cells 18 possess a tumor or cancer cell phenotype, 19 i.e., cancer hallmarks, as outlined by 20 Hannahan and Weinberg. 21 Do you agree with that 22 statement? 23 A. You know what, personally, I 24 don't know what Hannahan and Weinberg is</p>	<p style="text-align: right;">Page 252</p> <p>1 the fallopian tube fimbrial epithelial. 2 Do you agree with that 3 statement? 4 A. So there is data to support 5 that a lot of high-grade serous cancers 6 come from the fallopian tube fimbriae, 7 but not all ovarian cancers. 8 Q. The next statement says: 9 Hence, these studies should examine the 10 effects of talcum powder on FT, or 11 fallopian tube, cells. 12 Do you agree with that? 13 A. It would add to the study to 14 study fallopian tube epithelial cells, 15 that's what I would agree to. 16 Q. Turn over to the second 17 page, Bates number 70. Comment number 3 18 -- 19 A. That starts "The reviewer 20 recommends"? 21 Q. Yes, Doctor -- second 22 sentence says: The correlation to IHC is 23 insufficient to draw this conclusion -- 24 let me start from the beginning -- The</p>
<p style="text-align: right;">Page 251</p> <p>1 and, again, this is this reviewer's 2 opinion about the paper. 3 MR. HEGARTY: Turn to the 4 next set of comments from 5 Gynecologic Oncology. They are 6 Bates numbers 69 to 70, which I'll 7 mark as No. 19. 8 - - - 9 (Deposition Exhibit No. 10 Wolf-19, Gynecologic Oncology 11 Reviewer Comments, 12 SAED_SEPT222021_SUPPL_000069 and 13 SAED_SEPT222021-SUPPL_000070, was 14 marked for identification.) 15 - - - 16 MR. HEGARTY: Do you have 17 that paper in front of you? 18 THE WITNESS: I do. 19 BY MR. HEGARTY: 20 Q. Looking at the section on 21 specific comments at the bottom of the 22 first page, comment number 1 says: It is 23 now generally accepted that most 24 high-grade serous carcinoma arise from</p>	<p style="text-align: right;">Page 253</p> <p>1 reviewer recommends that further work be 2 undertaken to establish whether talcum 3 powder induces functional changes in 4 ovarian epithelial cells suggested by 5 malignant transformation. The 6 correlation to IHC is insufficient to 7 draw this conclusion and thus the results 8 of this study are overinterpreted. 9 Do you agree with those 10 statements? 11 MS. O'DELL: Object to the 12 form. 13 THE WITNESS: So I agree 14 that the results of the study 15 support malignant transformation, 16 cell proliferation. More data is 17 always better than less data and 18 that's what this reviewer in my 19 opinion is suggesting. 20 BY MR. HEGARTY: 21 Q. The comment goes on to say: 22 Given that the transformed cells were not 23 subcultured or further analyzed following 24 treatment conditions to show phenotypic</p>

Page 254

1 genetic/epigenetic or functional changes,
 2 the changes seen in IHC may be explained
 3 by cellular responses to treatments.
 4 Do you agree with that
 5 statement?
 6 A. I'm not sure what that
 7 statement means. I understand what
 8 they're saying, do more tests, but I
 9 don't know what they mean by cellular
 10 responses to treatments. That may be
 11 beyond my expertise.
 12 Q. The next statement says:
 13 Whereas durable alterations in p53
 14 staining may indicate mutations as in the
 15 clinical -- as in the case clinically,
 16 p53 expression at a single time point
 17 following treatment cannot differentiate
 18 between novel mutations and a physiologic
 19 response responsive to a given treatment
 20 condition.
 21 Do you agree with that
 22 statement?
 23 A. You can have increased p53
 24 expression that is either mutated or

Page 255

1 increased expression in normal p53.
 2 MR. HEGARTY: You can put
 3 those documents aside, Doctor.
 4 THE WITNESS: Okay. Thank
 5 you for sending them.
 6 MR. HEGARTY: You're
 7 welcome.
 8 BY MR. HEGARTY:
 9 Q. If you turn next to page 18
 10 of your report, the biologic gradient
 11 section --
 12 A. Yes.
 13 Q. -- you added to the biologic
 14 gradient section the Woolen paper which
 15 we talked about earlier?
 16 A. Yes.
 17 Q. What from the Woolen paper
 18 shows a dose-response?
 19 A. Can I have my -- I'm going
 20 to get the Woolen paper out again.
 21 (Pause.)
 22 THE WITNESS: So I believe
 23 I'm referring there to the
 24 supplemental table 1 where we

Page 256

1 compared less frequent users to
 2 daily users.
 3 BY MR. HEGARTY:
 4 Q. Well, do the authors of the
 5 Woolen paper report on dose-response?
 6 A. The authors of the Woolen
 7 paper were specifically looking at
 8 frequent users as their -- as per their
 9 definition. And so in the supplementary
 10 table, they look at less frequent users
 11 versus daily users. So in a sense, yes.
 12 Q. The authors, though, don't
 13 do any kind of interaction test to
 14 determine whether the odds ratios for
 15 less frequent users or daily users was
 16 statistically significantly different;
 17 correct?
 18 MS. O'DELL: Object to the
 19 form.
 20 THE WITNESS: I'm not aware
 21 that they did any interaction
 22 study.
 23 BY MR. HEGARTY:
 24 Q. Is it your contention,

Page 257

1 though, from supplementary table 1 that
 2 Woolen does show a dose-response?
 3 MS. O'DELL: Object to the
 4 form; misstates the statement in
 5 her report.
 6 THE WITNESS: So there's
 7 definitely a difference between
 8 less frequent users and daily
 9 users.
 10 BY MR. HEGARTY:
 11 Q. But is it your opinion from
 12 that data that this paper shows a
 13 dose-response?
 14 MS. O'DELL: Objection to
 15 the form.
 16 THE WITNESS: Well, it's my
 17 opinion that there's a difference
 18 between less frequent users and
 19 daily users.
 20 BY MR. HEGARTY:
 21 Q. And is that your -- is that
 22 what you're saying by adding the Woolen
 23 paper to this part of your report?
 24 A. Yes.

Page 258

1 Q. The Gertig 2000 study
 2 reported on the NHS1 dataset; correct?
 3 Do you remember that?
 4 MS. O'DELL: So, Mark, if
 5 you want to talk about Gertig, she
 6 just needs it in front of her.
 7 MR. HEGARTY: My question at
 8 this point was only whether she
 9 was aware of that finding.
 10 MS. O'DELL: I think it
 11 would be fair to have it in front
 12 of her since that's -- I mean,
 13 that study, she hasn't been
 14 examined on since 2019.
 15 MR. HEGARTY: I don't intend
 16 to examine her about it. My
 17 question was simply whether you're
 18 aware if Gertig 2000 reported on
 19 dose-response.
 20 THE WITNESS: Oh, that was
 21 not my understanding of your
 22 question. I thought you asked did
 23 they report on the first part of
 24 the Nurses' Health Study and the

Page 259

1 answer to that is yes --
 2 BY MR. HEGARTY:
 3 Q. Gertig 2000 did report on
 4 the first part of the Nurses' Health
 5 Study; correct?
 6 A. Okay. That's correct.
 7 Q. And that's data from which
 8 the Woolen paper took from; correct?
 9 MS. O'DELL: Objection to
 10 the form.
 11 THE WITNESS: I don't think
 12 they took it specifically from the
 13 paper. It was from the dataset.
 14 BY MR. HEGARTY:
 15 Q. Right. And do you recall
 16 that Gertig 2000 found no dose-response
 17 -- or reported no dose-response?
 18 MS. O'DELL: Objection to
 19 the form.
 20 THE WITNESS: You know, I
 21 have to look at the numbers to see
 22 if the numbers are the same of the
 23 daily users in the Gertig paper.
 24 I have the Gertig paper in front

Page 260

1 of me. Can I -- let me get the
 2 Woolen paper. So -- I'm trying to
 3 add up their numbers.
 4 So the numbers are
 5 different. So the numbers
 6 reported in the Gertig paper of
 7 daily users is 48. The numbers
 8 extracted from the NHS1 study
 9 reported in the Woolen paper are
 10 157, so it's different numbers.
 11 BY MR. HEGARTY:
 12 Q. What did the authors of the
 13 Gertig 2000 paper report as to
 14 dose-response?
 15 A. So their reports -- their
 16 confidence intervals are the same, but I
 17 also don't see if they did a comparison,
 18 but those numbers are different and
 19 smaller than in the Woolen study. So
 20 it's apples to oranges. It's two
 21 different groups of people. One is a
 22 subset of the other, I assume.
 23 Q. Understood. Putting that
 24 apples and oranges aside, just focusing

Page 261

1 on Gertig, what did the Gertig 2000 paper
 2 report as to dose-response?
 3 MS. O'DELL: Object to the
 4 form.
 5 THE WITNESS: So I'm looking
 6 to see the actual words they use
 7 because I don't see that they
 8 compared between the groups of
 9 never, less than once a week, one
 10 to six times a week, and daily.
 11 They also don't report a
 12 statistical comparison. So I'm
 13 looking for the words in the
 14 results.
 15 (Pause.)
 16 THE WITNESS: They don't
 17 really say. They don't -- they
 18 don't really say that I can see.
 19 For women who reported ever, daily
 20 use of talc, relative risk was
 21 1.49. Talc less than once a week
 22 was 1.29 and one to six times a
 23 week, 1.49, and they don't report
 24 that they compared them.

Page 262

1 BY MR. HEGARTY:
 2 Q. If you're looking at the
 3 background section in the results, don't
 4 they report that there was no increase in
 5 risk of ovarian cancer with increasing
 6 frequency of use?
 7 A. Are you looking at the
 8 abstract or the results?
 9 Q. I'm looking at the abstract
 10 in the results part of the abstract.
 11 A. I was reading the actual
 12 results.
 13 Q. My question, though, is, in
 14 the results section on the very first
 15 page as part of the abstract, they report
 16 they found no increase in risk of ovarian
 17 cancer with increasing frequency of use;
 18 correct?
 19 A. That's what the abstract
 20 says. That -- I don't see that in the
 21 actual results.
 22 Q. That's another way of saying
 23 they found no dose-response based on
 24 frequency of use; correct?

Page 263

1 MS. O'DELL: Objection to
 2 the form; misstates her testimony.
 3 THE WITNESS: What I'm
 4 saying is, that says that in the
 5 abstract. It doesn't say it in
 6 the results and it doesn't show
 7 that they compared differences
 8 either in the table or the actual
 9 words of the result.
 10 BY MR. HEGARTY:
 11 Q. Where you talk about Woolen
 12 in the biologic gradient section, you
 13 don't make a reference to Gertig 2000;
 14 correct?
 15 A. I don't -- I did not cite
 16 it, no. Small numbers, again, there's
 17 less than a third of the patients were
 18 daily users in the Gertig paper as
 19 opposed to the data that was reported in
 20 the Woolen study from the Nurses' Health
 21 Study.
 22 Q. Have you done any recent --
 23 strike that.
 24 Have you reviewed the most

Page 264

1 recent NCI PDQ from October 2023?
 2 A. I have.
 3 Q. Do you reference it anywhere
 4 in your November 2023 amended report,
 5 that is, the body of the report?
 6 A. I don't think I mentioned it
 7 in the body of my report, no.
 8 Q. Have you done any research
 9 or analysis into the creation of the NCI
 10 PDQ since September 2021?
 11 A. No.
 12 Q. Have you done any research
 13 or analysis into the editorial boards of
 14 the NCI PDQ since September 2021?
 15 A. No --
 16 MS. O'DELL: Object to the
 17 form.
 18 THE WITNESS: No, other than
 19 reading the most recent PDQ.
 20 BY MR. HEGARTY:
 21 Q. Have you done any other type
 22 of work in this litigation with respect
 23 to the NCI PDQ for ovarian cancer since
 24 your September 2021 deposition besides

Page 265

1 reviewing the most recent version?
 2 A. No.
 3 Q. Have you reached out to
 4 anyone on the NCI board since September
 5 2021 about the PDQ for ovarian cancer?
 6 A. No.
 7 Q. Do you have any opinions
 8 that you intend to offer or -- strike
 9 that.
 10 Do you have any opinions in
 11 this case with regard to the most recent
 12 NCI PDQ?
 13 A. I mean, just to me that
 14 similar to what the previous ones show,
 15 that they don't review all of the
 16 literature. Most of the literature that
 17 they cite does show a increased risk of
 18 ovarian cancer in women who use talc and
 19 that their interpretation of the Woolen
 20 study and the -- specifically the data
 21 from the Nurses' Health Study that they
 22 got, to my view, is not correct.
 23 Q. Since September 2021, have
 24 you become aware of any gynecologic

<p style="text-align: right;">Page 266</p> <p>1 oncologists who are not experts for 2 plaintiffs in talcum powder cases who 3 have the same opinion that you do that 4 talcum powder use can cause ovarian 5 cancer? 6 MS. O'DELL: Object to the 7 form. 8 THE WITNESS: I have not, 9 but I have not asked anyone. 10 MR. HEGARTY: With regard to 11 the materials that you have with 12 you today, Doctor, I want to 13 designate some of those as 14 exhibits. 15 THE WITNESS: Okay. 16 MR. HEGARTY: First of all, 17 the -- your general report, I want 18 to designate that as Exhibit No. 19 20. 20 - - - 21 (Deposition Exhibit No. 22 Wolf-20, General Report of Dr. 23 Wolf Present with Witness, was 24 marked for identification.)</p>	<p style="text-align: right;">Page 268</p> <p>1 Gallardo. 2 - - - 3 (Deposition Exhibit No. 4 Wolf-22, Gallardo Case-Specific 5 Report of Dr. Wolf Present with 6 Witness, was marked for 7 identification.) 8 - - - 9 MR. HEGARTY: I want to 10 designate as Exhibit No. 23 Dr. 11 Wolf's report for Ms. Bondurant. 12 - - - 13 (Deposition Exhibit No. 14 Wolf-23, Bondurant Case-Specific 15 Report of Dr. Wolf Present with 16 Witness, was marked for 17 identification.) 18 - - - 19 MR. HEGARTY: I want to 20 designate Exhibit No. 24 Dr. 21 Longo's exposure report, as we 22 referred to it as. 23 - - - 24 (Deposition Exhibit No.</p>
<p style="text-align: right;">Page 267</p> <p>1 - - - 2 MR. HEGARTY: Your report 3 for Ms. Judkins, I want to 4 designate as Exhibit 21 -- 5 - - - 6 (Deposition Exhibit No. 7 Wolf-21, Judkins Case-Specific 8 Report of Dr. Wolf Present with 9 Witness, was marked for 10 identification.) 11 - - - 12 MS. O'DELL: I don't 13 understand, Mark. You've 14 previously -- you've previously 15 marked those. 16 MR. HEGARTY: But I want to 17 mark what she -- I want to attach 18 as exhibits to this deposition the 19 materials that Dr. Wolf brought 20 with her to the deposition. 21 MS. O'DELL: Okay. 22 MR. HEGARTY: I want to 23 designate as Exhibit No. 22 Dr. 24 Wolf's specific report for Ms.</p>	<p style="text-align: right;">Page 269</p> <p>1 Wolf-24, Dr. Longo's Exposure 2 Report Present with Witness, was 3 marked for identification.) 4 - - - 5 MR. HEGARTY: I want to 6 designate as Exhibit No. 25 Dr. 7 Longo's November 2023 general 8 report. 9 - - - 10 (Deposition Exhibit No. 11 Wolf-25, Dr. Longo's MDL Third 12 Supplemental Report Present with 13 Witness, was marked for 14 identification.) 15 - - - 16 MR. HEGARTY: I want to 17 designate as Exhibit No. 26 the 18 report of Dr. Levy that Dr. Wolf 19 brought with her to her 20 deposition. 21 - - - 22 (Deposition Exhibit No. 23 Wolf-26, Dr. Levy's Report Present 24 with Witness, was marked for</p>

Page 270

1 identification.)
 2 - - -
 3 MR. HEGARTY: And I want to
 4 designate as Exhibit 27 the
 5 entirety of the literature that
 6 Dr. Wolf brought with her to the
 7 deposition.
 8 - - -
 9 (Deposition Exhibit No.
 10 Wolf-27, Entirety of Literature
 11 Dr. Wolf Brought to Deposition,
 12 was marked for identification.)
 13 - - -
 14 BY MR. HEGARTY:
 15 Q. Have I covered with that
 16 description and designation of exhibits
 17 all the materials you brought with you to
 18 the deposition, Dr. Wolf?
 19 A. Yes, I believe so.
 20 MS. O'DELL: Mark, for
 21 clarification, Exhibit 25 is --
 22 you referred to it as Dr. Longo's
 23 general report and it should be
 24 referred to as his third

Page 271

1 supplemental report, because as
 2 you know, he has others. So it's
 3 his MDL third supplemental report,
 4 and as I understand it, you marked
 5 that as Exhibit 25.
 6 MR. HEGARTY: You're right
 7 and thank you for that further
 8 description, and that indeed
 9 should be Exhibit No. 25.
 10 BY MR. HEGARTY:
 11 Q. We talked earlier, Doctor,
 12 about your preparation for this
 13 deposition and your meeting with counsel.
 14 Since September 2021, have you interacted
 15 with any counsel for plaintiffs in the
 16 MDL on a social basis?
 17 A. No -- well, no, except the
 18 day that I was working on my amended
 19 report, we had dinner together after we
 20 were done with work. That's the only
 21 time.
 22 Q. Who did you have dinner
 23 with?
 24 A. Leigh O'Dell, Margaret

Page 272

1 Thompson, and Ellen Smith.
 2 Q. Since September 2021 and
 3 before yesterday, was that the only time
 4 you've had a get-together with any of
 5 those lawyers or any other lawyer for
 6 plaintiffs in the MDL litigation?
 7 A. Yes, except there was one
 8 time when I needed a Texas-licensed
 9 doctor to approve that I was a physician
 10 for some medical license or hospital
 11 credentialing, that I met Margaret
 12 outside of her exercise place and she
 13 agreed to sign and be a reference.
 14 And that was all. It was a
 15 two-minute visit. She signed the piece
 16 of paper for me. That's the only other
 17 time.
 18 MR. HEGARTY: Let's go off
 19 the record.
 20 - - -
 21 (A discussion off the record
 22 occurred.)
 23 - - -
 24 MR. HEGARTY: We're back on

Page 273

1 the record, Kim, and we had a
 2 discussion off the record where
 3 I'm at my four hours; therefore,
 4 I'm going to finish for today
 5 given that I am at that time.
 6 But going back to our
 7 initial discussion on the record,
 8 I'm leaving the deposition open,
 9 from the J & J defendants'
 10 standpoint, because of the
 11 disclosure and the timing of the
 12 disclosure with regard to the
 13 three reports that I marked as
 14 Exhibits 24, 25, and 26 -- I'm not
 15 going to repeat what we talked
 16 about earlier. I'll just refer
 17 back to it -- and note that we
 18 will pursue additional time with
 19 Dr. Wolf so that we can properly
 20 cover those materials.
 21 Also, as I did mention, I
 22 think on the record, that because
 23 this case -- this deposition does
 24 involve three additional reports,

Page 274

1 case-specific reports, and I
 2 needed to use some of my time for
 3 those reports, that it would be
 4 appropriate to extend this time to
 5 accommodate for that, but I
 6 understand plaintiffs' counsel's
 7 position.
 8 So with that, again, I will
 9 conclude my questioning for now.
 10 MS. O'DELL: We've put on
 11 the record extensively our
 12 position on the timing. We're
 13 complying with the Court's order
 14 of four-hour limit. We'll take a
 15 short break and I'll come back and
 16 I have a few follow-up questions
 17 for Dr. Wolf, probably about five
 18 minutes, and we'll try to be
 19 efficient.
 20 MR. HEGARTY: Okay. Thank
 21 you. I'll be right back.
 22 (A recess was taken from
 23 4:06 p.m. to 4:14 p.m.)
 24 MS. O'DELL: Let's go back

Page 275

1 on the record.
 2 - - -
 3 EXAMINATION
 4 - - -
 5 BY MS. O'DELL:
 6 Q. Dr. Wolf, I have a few
 7 questions for you in follow-up to the
 8 examination by counsel for Johnson &
 9 Johnson.
 10 I'm going to begin by
 11 referring to the reports that counsel for
 12 J & J marked as, first, the exposure
 13 analysis that Dr. Longo conducted on the
 14 individual plaintiffs, bellwether
 15 plaintiffs.
 16 Is that information that you
 17 needed to reach your opinions in this
 18 case?
 19 A. No. It's -- it's just
 20 additional information that affirms my
 21 opinion.
 22 Q. Would that also be true for
 23 Exhibit 25, which is the third
 24 supplemental report that Dr. Longo

Page 276

1 issued?
 2 A. Yes.
 3 Q. And as to Exhibit 26, which
 4 is Dr. Levy's report regarding his
 5 analysis of the particular genetic
 6 testing of patients, did you review it?
 7 A. I did review it after I had
 8 already completed my report and formed my
 9 opinion, and it's additional information
 10 that I didn't need, but that affirms the
 11 opinion that I already formed and I stand
 12 by my opinion.
 13 Q. And is it your practice just
 14 to continue reading relevant material in
 15 order to be informed as you testify in
 16 this case?
 17 A. Yes --
 18 MR. HEGARTY: Objection to
 19 the form.
 20 BY MS. O'DELL:
 21 Q. So I'd like to ask some
 22 follow-up questions about -- in
 23 particular about the Davis study.
 24 Turning to your report -- actually,

Page 277

1 Doctor, if you turn to your report and --
 2 the general section -- there are various
 3 exhibits that were marked, but I want to
 4 direct you specifically to page --
 5 forgive me. Let me just turn there very
 6 quickly -- it is page 9 of your report.
 7 And specifically I want to direct your
 8 attention to the forest plot on page 9 of
 9 your report.
 10 Did you report an analysis
 11 of dose-response for the Davis 2021
 12 study?
 13 A. Yes, for all of the studies
 14 in that chart.
 15 Q. And what is -- in regard to
 16 dose-response, what's included in the
 17 forest plot?
 18 A. No, that they did not
 19 evaluate dose-response.
 20 Q. And so to the degree it was
 21 suggested that you did not note that
 22 information for the data study in your
 23 report, and that suggestion was made by
 24 counsel for defendants, that would not

<p style="text-align: right;">Page 278</p> <p>1 have been correct.</p> <p>2 A. That's not correct. It's in</p> <p>3 the --</p> <p>4 MR. HEGARTY: I'm sorry.</p> <p>5 Would you -- I was looking for the</p> <p>6 Davis paper. I didn't follow the</p> <p>7 question that was asked.</p> <p>8 THE WITNESS: Did they see a</p> <p>9 dose-response and the answer is</p> <p>10 no, and so it's not that they</p> <p>11 didn't look for it, they did not</p> <p>12 see a dose-response and it's</p> <p>13 reported in that.</p> <p>14 And so there's a column --</p> <p>15 one, two, three, four -- the fifth</p> <p>16 column in the forest plot.</p> <p>17 MR. HEGARTY: Fifth column</p> <p>18 in the forest plot in what paper?</p> <p>19 THE WITNESS: On page 9, in</p> <p>20 my report.</p> <p>21 MR. HEGARTY: Just a second.</p> <p>22 Let me pull that up.</p> <p>23 MS. O'DELL: Page 9 of her</p> <p>24 general portion of her expert</p>	<p style="text-align: right;">Page 280</p> <p>1 Doctor, I want to mark for your</p> <p>2 deposition as Exhibit -- I believe</p> <p>3 we're up to 28 -- and, Mark, I</p> <p>4 will put this in the chat and so</p> <p>5 you will have it -- this is the</p> <p>6 public access version of the Davis</p> <p>7 paper, I'll represent to you that,</p> <p>8 and I'll ask Dr. Wolf about it.</p> <p>9 Give me just a moment here.</p> <p>10 - - -</p> <p>11 (Deposition Exhibit No.</p> <p>12 Wolf-28, HHS Public Access</p> <p>13 "General powder use and risk of</p> <p>14 epithelial ovarian cancer in the</p> <p>15 Ovarian Cancer in Women of African</p> <p>16 Ancestry Consortium" Paper by</p> <p>17 Davis, et al, was marked for</p> <p>18 identification.)</p> <p>19 - - -</p> <p>20 MS. O'DELL: It should be in</p> <p>21 the chat, coming up right now.</p> <p>22 MR. HEGARTY: Okay.</p> <p>23 MS. O'DELL: And I'll share</p> <p>24 my screen. And, Dr. Wolf, can you</p>
<p style="text-align: right;">Page 279</p> <p>1 report, the forest plot.</p> <p>2 MR. HEGARTY: I'm getting</p> <p>3 there.</p> <p>4 MS. O'DELL: Okay, Mark.</p> <p>5 You marked eight copies of her</p> <p>6 report --</p> <p>7 MR. HEGARTY: That's why I'm</p> <p>8 having -- I want to make sure I'm</p> <p>9 finding the one for -- let me pull</p> <p>10 it up here. I'm sorry.</p> <p>11 MS. O'DELL: It's the same</p> <p>12 on each one.</p> <p>13 MR. HEGARTY: Okay. You</p> <p>14 said it's on page 9? I'm sorry.</p> <p>15 THE WITNESS: Page 9. It's</p> <p>16 the fourth column, I lied. It's</p> <p>17 the fourth column dose-response</p> <p>18 labeled DR, so did they look at a</p> <p>19 dose-response or did they see a</p> <p>20 dose-response.</p> <p>21 MR. HEGARTY: Okay. Thank</p> <p>22 you. I'm following you now.</p> <p>23 MS. O'DELL: All right.</p> <p>24 Also in regard to the Davis study,</p>	<p style="text-align: right;">Page 281</p> <p>1 see that on your screen?</p> <p>2 THE WITNESS: I can.</p> <p>3 BY MS. O'DELL:</p> <p>4 Q. And is this the HHS Public</p> <p>5 Access version of the Davis paper?</p> <p>6 A. That's what it says it is,</p> <p>7 yes.</p> <p>8 Q. And I'm scrolling down to</p> <p>9 the first page and at the bottom, it has</p> <p>10 a section called "Conflict of Interest</p> <p>11 Disclosure Statement."</p> <p>12 Do you see that, Doctor?</p> <p>13 A. I do.</p> <p>14 Q. And what does it say in</p> <p>15 regard to Dr. Patricia Moorman?</p> <p>16 A. It says: Patricia Moorman</p> <p>17 has received compensation for work</p> <p>18 related to litigation in regard to talc</p> <p>19 and ovarian cancer.</p> <p>20 Q. And then I'd like for you to</p> <p>21 turn now to the Woolen paper. And</p> <p>22 looking at the Woolen paper, there was a</p> <p>23 suggestion by counsel for Johnson &</p> <p>24 Johnson that -- in relation to Dr.</p>

<p style="text-align: right;">Page 282</p> <p>1 Smith-Bindman, that she had not included 2 a proper disclosure in the paper. 3 Do you recall that question? 4 MR. HEGARTY: Objection to 5 the form. 6 THE WITNESS: I recall a 7 statement that there should be a 8 disclosure. 9 BY MS. O'DELL: 10 Q. And do you also a recall a 11 suggestion that somehow Dr. Smith-Bindman 12 did not include information regarding her 13 work in litigation in the paper? Do you 14 recall that suggestion? 15 MR. HEGARTY: Objection to 16 the form, also misstates my 17 questioning. 18 MS. O'DELL: I don't believe 19 it does; but, nevertheless, what 20 did Dr. Smith-Bindman include in 21 the disclosure at the end of the 22 paper regarding her work in 23 litigation? 24 THE WITNESS: Under</p>	<p style="text-align: right;">Page 284</p> <p>1 asked a lot of questions about Harper 2 '23. 3 A. Yes. 4 Q. And I guess my ultimate 5 question to you, describe -- are the 6 studies that you cite in this paragraph, 7 Shukla, Buz'Zard, Akhtar, Mandarino, Emi, 8 and Harper, as well as Fletcher, are the 9 data from those studies, in your opinion, 10 consistent? 11 A. Yes. 12 Q. And why is that? 13 A. They all show changes in 14 cellular proliferation and/or some other 15 activity pointing towards activating 16 cells after exposure to talc that would 17 be consistent with a causation of talc in 18 ovarian cancer. 19 Q. And do all the studies 20 demonstrate that talc or similar 21 substances can cause reactive oxygen 22 species or other indications of 23 inflammation? 24 A. Yes.</p>
<p style="text-align: right;">Page 283</p> <p>1 "Conflict of Interest," it says: 2 Rebecca Smith-Bindman served as a 3 paid expert witness for the 4 plaintiffs in the talcum powder 5 litigation. 6 BY MS. O'DELL: 7 Q. And is that crystal clear 8 that she served as an expert and to whom 9 she -- for whom she testified? 10 A. Yes. 11 Q. And then, Doctor, I'd love 12 for you to turn back to your report, 13 please, and I'll direct your attention to 14 page 8 of -- excuse me. That's not true 15 -- it is actually page 15, paragraph 8, 16 page 15 -- 17 A. Paragraph 8. 18 Q. -- paragraph 8 and it's a 19 paragraph that describes the in vitro 20 studies that have been done in relation 21 to talc and related substances. 22 Do you see that? 23 A. Yes. 24 Q. And, specifically, you were</p>	<p style="text-align: right;">Page 285</p> <p>1 MR. HEGARTY: Objection to 2 the form. 3 MS. O'DELL: No further 4 questions, Doctor. Thank you very 5 much. 6 All right. I think that -- 7 MR. HEGARTY: I can -- it 8 doesn't sound like I'm going to 9 get any follow-up. 10 MS. O'DELL: You've got two 11 minutes. 12 MR. HEGARTY: All right. I 13 got two minutes. 14 MS. O'DELL: Maybe. 15 - - - 16 EXAMINATION 17 - - - 18 BY MR. HEGARTY: 19 Q. With regard to the 20 meta-analysis chart we looked at on page 21 9 of your report, did you prepare that 22 chart? 23 A. No, that was prepared by Dr. 24 Ann McTiernan and she shared it. It was</p>

Page 286

1 in my -- it's been in my report since the
 2 beginning --
 3 Q. Where did the addition --
 4 where did the addition to the Woolen
 5 paper then come from?
 6 A. So the new papers were added
 7 to it. The chart has just been added to
 8 as new -- new papers came in.
 9 Q. And is that chart, that is,
 10 the current chart you have in your
 11 report, also from Dr. McTiernan?
 12 A. Yes.
 13 Q. And did you pull that from
 14 her most recent report?
 15 A. Yes.
 16 Q. And as to the publication --
 17 A. I -- yeah, I don't know if
 18 it was when her report was finalized, but
 19 she shared it before I completed my
 20 report, yes.
 21 Q. As far as the public access
 22 paper you looked at, was that the version
 23 of the Moorman paper that you had with
 24 you?

Page 287

1 A. No.
 2 Q. As far as the Woolen paper
 3 goes, the description that you were asked
 4 about with regard to Dr. Smith-Bindman
 5 was in the conflict of interest section.
 6 Do you remember that?
 7 A. That's correct.
 8 Q. And that is a conflict of
 9 interest that should be disclosed, that
 10 is, what is disclosed for Dr.
 11 Smith-Bindman; correct?
 12 MS. O'DELL: Object to the
 13 form.
 14 THE WITNESS: So she
 15 disclosed that she was a paid
 16 witness, that, yes, she disclosed
 17 it --
 18 BY MR. HEGARTY:
 19 Q. And the statement as to Dr.
 20 Smith-Bindman there is also true as to
 21 you. You are a -- you are a paid expert
 22 witness for the plaintiffs in the talcum
 23 powder litigation; correct?
 24 A. I am.

Page 288

1 Q. And that is something that
 2 anyone who is hearing your opinions
 3 should be aware of; correct?
 4 MS. O'DELL: Object to the
 5 form.
 6 THE WITNESS: That's what I
 7 would disclose.
 8 BY MR. HEGARTY:
 9 Q. And just, finally, as to Dr.
 10 McTiernan's meta-analysis table that we
 11 looked at, how did you get that? Did
 12 that come directly from her or did you
 13 get it from some other source?
 14 A. I think that she told the
 15 plaintiffs' attorneys that I could have
 16 it and shared it through them.
 17 Q. Did you get it directly from
 18 her?
 19 A. I don't recall.
 20 MR. HEGARTY: Thank you.
 21 Those are all the questions I have
 22 for the moment, subject to my
 23 earlier statements.
 24 MS. O'DELL: That's it.

Page 289

1 We're off the record.
 2 THE WITNESS: Thank you.
 3 - - -
 4 (A discussion off the record
 5 occurred.)
 6 - - -
 7 MR. HEGARTY: So, Kim,
 8 without responding to via e-mail,
 9 we'll take a rough as well;
 10 otherwise, we will -- we will
 11 follow what we have in our
 12 standing order.
 13 (Witness excused.)
 14 (Deposition adjourned at
 15 approximately 4:28 p.m.)
 16
 17
 18
 19
 20
 21
 22
 23
 24

KIMBERLY A. CAHILL, a
Federally Approved Registered
Merit Reporter
Certified Court Reporter
Notary Public
Dated: January 13, 2024

PAGE	LINE	CHANGE
1	1	1
2	1	1
3	1	1
4	1	1
5	1	1
6	1	1
7	1	1
8	1	1
9	1	1
10	1	1
11	1	1
12	1	1
13	1	1
14	1	1
15	1	1
16	1	1
17	1	1
18	1	1
19	1	1
20	1	1
21	1	1
22	1	1
23	1	1
24	1	1
25	1	1
26	1	1
27	1	1
28	1	1
29	1	1
30	1	1
31	1	1
32	1	1
33	1	1
34	1	1
35	1	1
36	1	1
37	1	1
38	1	1
39	1	1
40	1	1
41	1	1
42	1	1
43	1	1
44	1	1
45	1	1
46	1	1
47	1	1
48	1	1
49	1	1
50	1	1
51	1	1
52	1	1
53	1	1
54	1	1
55	1	1
56	1	1
57	1	1
58	1	1
59	1	1
60	1	1
61	1	1
62	1	1
63	1	1
64	1	1
65	1	1
66	1	1
67	1	1
68	1	1
69	1	1
70	1	1
71	1	1
72	1	1
73	1	1
74	1	1
75	1	1
76	1	1
77	1	1
78	1	1
79	1	1
80	1	1
81	1	1
82	1	1
83	1	1
84	1	1
85	1	1
86	1	1
87	1	1
88	1	1
89	1	1
90	1	1
91	1	1
92	1	1
93	1	1
94	1	1
95	1	1
96	1	1
97	1	1
98	1	1
99	1	1
100	1	1

Page 293

INSTRUCTIONS TO WITNESS

Please read your deposition over carefully and make any necessary corrections. You should state the reason in the appropriate space on the errata sheet for any corrections that are made.

After doing so, please sign the errata sheet and date it.

You are signing same subject to the changes you have noted on the errata sheet, which will be attached to your deposition.

It is imperative that you return the original errata sheet to the deposing attorney within thirty (30) days of receipt of the deposition transcript by you. If you fail to do so, the deposition transcript may be deemed to be accurate and may be used in court.

ACKNOWLEDGMENT OF DEPONENT

I, _____, do hereby certify that I have read the foregoing pages, 1 - 294, and that the same is a correct transcription of the answers given by me to the questions therein propounded, except for the corrections or changes in form or substance, if any, noted in the attached Errata Sheet.

JUDITH KAY WOLF, M.D. DATE

Subscribed and sworn
to before me this
_____ day of _____, 20____.

My commission expires:_____

Notary Public

LAWYER'S NOTES		
PAGE	LINE	
1		
2		
3		
4		
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		

<u>WORD INDEX</u>				
< 0 >	1.47 174:6	127:7 128:5	17th 17:11	2000 258:1,
0.97 171:9	175:4 205:6	11:43 43:20	29:19	18 259:3, 16
	1.49 261:21,	110 3:23	18 236:10	260:13
	23	114 8:10	246:10	261:1
< 1 >	1.53 171:9	116 4:1	255:9	263:13
1 71:24	186:13	119 4:3	1825 2:9	20006 2:10
72:4 73:10	187:8	11th 113:22	1835 2:14	2012 210:24
75:5 109:6	1.65 205:7	12 38:24	19 188:11	2014 100:6,
143:15	1.77 159:3	42:9, 13	251:7	11
157:17	1.88 208:22	167:3	19013 2:15	2017 3:22
158:5, 7, 10,	209:7	12:54	192 5:5	107:3, 11
14, 17, 24	1/5/2019	115:11	193 36:12	2018 37:21
159:4, 7	116:17	121 72:5	1956 96:14	81:1, 17
171:9	1:04 115:11	124 4:6	1st 30:11	2019 37:21
172:2	10 1:13	125 4:9		49:19
198:3	42:9, 13	127 4:12	< 2 >	57:20
201:15	128:1, 19	128 4:15	2 3:16	58:17, 24
202:6	143:6	13 122:12	79:24 80:3	59:3, 9, 11
203:10, 21	165:17	192:16	85:6 101:2,	84:20
204:7, 8, 14	166:4	194:12, 24	8 136:21	117:2
251:22	220:12	197:17, 18	143:3	122:11
255:24	10:00	290:21	153:24	258:14
257:1 293:6	120:12	14 122:12	155:11	202 2:11
1.02 184:22	10:04 12:16	206:14	157:16	2020 196:3,
1.04 201:24	10:09 12:23	142 4:18	171:11	14 198:18
202:9	10:15 1:19	15 28:12	173:1, 7	199:11
1.05 174:5,	10:31 24:16	124:8, 16	175:23	213:17
18 175:2	10:50 24:19	126:1	196:9	2021 18:19
176:8	10:52 43:20	128:20	198:8	26:9, 18
1.10 203:4	100 246:8	136:9	199:24	27:7 36:24
1.12 155:4	101 246:17	213:22, 24	203:2, 8, 12	37:9, 18
1.18 183:19	107 3:19	214:23	218:1	38:5, 7
1.19 159:1	10th 30:5	283:15, 16	2:18 192:6	42:23 44:2,
186:15	113:23	157 260:10	2:33 192:6	5, 12, 19
187:10	11 142:10	15th 16:11	20 25:1, 2	47:1, 3, 9, 14,
1.21 184:21	197:17	29:20	44:7 46:2	20 48:1, 6,
1.22 171:7	205:19, 23	127:15	107:14	16, 22, 24
1.29 261:22	206:1	16 220:23	178:3, 4	49:4 50:4,
1.31 205:6	11/15/23	16-2738 1:4	186:12, 15	14, 19 51:13,
1.34 183:19	3:15 4:6, 9,	1663 180:17	187:10, 12	17, 24 54:2,
1.38 155:5	12, 15 71:8	1667 189:1	188:7, 8, 10	7, 14, 17
	124:19	167 4:22	266:19	55:1, 21
	125:12	17 19:6, 9	293:20	57:2, 9, 13,
		213:14, 20	200 175:24	18 58:9

59:10, 19	166:13	128:20	273:14	252:17
60:8, 23	193:21	136:9	275:23	3:21 246:3
61:13, 16	206:12	178:16	251 6:9	3:39 246:3
62:14	213:18	226:21	2555 2:18	30 40:19
63:23	215:15	264:1, 4	26 4:8, 11,	44:7 46:2
64:12, 15, 20	264:10, 14,	269:7	14, 17	113:22
65:5, 17	24 265:5, 23	2024 1:13	123:14	122:11
66:4, 14	271:14	38:15, 19, 24	124:14, 20	168:7
67:1, 11, 22	272:2	39:6 49:15	125:12	291:16
68:3, 11, 20	277:11	50:2 58:7	127:7, 14	300 1:13
69:22 70:8,	2022 39:21,	90:21	128:5, 19	30th 18:19
14, 20 72:14	22 40:4, 17	100:9	136:8	31 204:18
75:20 76:1,	41:2, 23	114:15, 18	269:17	205:7
15 81:18	42:3, 8	118:1	273:14	31st 91:23
84:22 85:3,	59:7 75:17	290:21	276:3	32 168:7
13, 20 86:6,	139:15, 17,	206 5:9	266 6:13	325 179:14
10, 22 87:11,	21 177:21	21 38:14	267 6:15	33 72:4
15, 19 88:1,	2023 4:1	60:18	268 6:18, 21	334 2:5
6, 11, 17, 23	16:11 17:7	124:1	269 6:24	335-2600
89:2 91:6	19:7, 9, 10	128:14	7:3, 4	2:11
93:8 96:2,	28:12	267:4	269-2343	35 40:19
22 97:12	29:19, 21	215 2:15	2:5	36104 2:5
100:3, 18	31:22	5:15	27 270:4	362 83:9, 11
105:18, 24	32:15 33:4	218 2:4	270 7:6	363 83:15
106:4	40:6, 21	21st 39:11	275 3:6	39 159:3
109:6, 7, 12	41:3, 23	22 171:14	28 112:18	
110:5, 23	42:4, 8	185:8	113:20	< 4 >
111:20	63:21 68:7	267:23	280:3	4 110:9
112:7	69:2 71:2	221 5:19	280 7:10	111:19, 23
113:1	72:3, 8	23 106:2	285 3:7	113:18
118:5, 9, 12,	75:16, 17	171:15	28th 112:1	139:8
18 119:3, 6	91:23 97:2,	175:18	29 113:24	178:6, 9
122:11, 12,	8 108:16	185:7	2900 2:14	182:5
13, 22	109:2, 19	268:10	294 293:6	183:2
130:19	110:10, 17,	284:2	2nd 3:15	184:19
131:3, 10, 16	24 112:1, 8,	236 5:24	71:8	204:1 248:2
132:6, 13, 18	18, 19 113:2,	6:5		4:06 274:23
133:4, 11, 23	20, 21, 22, 23,	24 268:20	< 3 >	4:14 274:23
134:1, 8, 16	24 114:4, 7	273:14	3 106:21	4:28 289:15
135:4, 21	115:16	25 3:6	110:4	40 171:16
137:7, 20	117:5, 6	269:6	111:2	185:8
138:14	124:9, 16	270:21	246:18	402 171:12
139:6	126:1	271:5, 9	247:15, 16	410 84:14,
165:13, 19	127:15			15

441 73:19 74:11, 17 75:5, 15, 18 76:11 77:19, 24 452 76:5 466 76:5 474-6550 2:19 48 260:7 49 159:1 < 5 > 5 93:2 115:24 164:11, 13 176:3 178:2, 9 186:5 198:9 249:23 51 171:14 185:9 52 90:22 531 74:12, 17 75:5, 15, 19 76:12 77:19, 24 5th 117:2 < 6 > 6 8:10 18:18 119:13 120:6 213:16, 24 60 17:24 23:6, 23 24:4 600 106:7 64108 2:19 65 204:18 205:7	650 106:8 179:15 68 96:14 98:17 183:11, 17 69 84:2 251:6 < 7 > 7 76:5 122:11 124:13 136:18 165:17 70 251:6 252:17 700 2:10 71 3:12 72 90:23 95:22 229:1, 7 73 89:13 90:21 75 174:6 175:3 78 95:22 98:19 < 8 > 8 125:9 226:20 283:14, 15, 17, 18 80 3:16 171:16 185:10 816 2:19 84 203:4 877.370.3377 1:23 < 9 > 9 112:19 126:21	143:15 277:6, 8 278:19, 23 279:14, 15 285:21 9:30 21:16 9:50 43:9 917.591.5672 1:23 96 203:3, 22 964 143:13, 16, 18 97 119:1 985-9177 2:15 99 119:2 9th 113:20 < A > a.m 1:19 43:20 120:12 ability 92:6 290:12 able 30:2 239:20 absence 148:10 absolutely 84:21 147:17 148:23 239:10 abstract 75:10 174:2, 8, 15 204:14 246:23 262:8, 9, 10, 15, 19 263:5 academic 118:22	accept 147:5, 23 156:24 acceptable 182:8, 14 accepted 219:11 249:5 251:23 accepts 141:17 Access 7:10 280:6, 12 281:5 286:21 accommodat e 242:19 274:5 accommodati ons 138:22 accompany 120:21 accurate 122:14 129:8, 11 291:20 accurately 117:10 achieved 229:6 acknowledg ment 152:22 293:2 act 144:15, 22 145:12 action 247:3, 5 290:15, 16 activating 219:18 284:15 activation 214:10	221:19 223:17 224:24 225:17 activities 46:24 92:6 99:12, 23 activity 195:8 284:15 actual 126:14 152:23 183:23 261:6 262:11, 21 263:8 acute 248:5 add 16:17 32:18 34:16 87:3 140:21 157:9 166:18 198:1 207:5 213:4 214:4 221:12 252:13 260:3 added 117:19 139:13 166:11 175:24 205:21 211:15 213:16 255:13 286:6, 7 adding 257:22
--	--	---	--	---

addition	advised	182:1, 2	167:10	264:4
11:24 45:4	24:18	195:11, 16	192:24	271:18
139:10	55:22 56:1	204:22	206:22	amending
192:9, 10	affect	211:22	215:6	32:13
222:18, 19,	149:12	212:9, 15	221:5	amendment
20 286:3, 4	150:9	227:23	236:16	65:14
additional	affirm	228:3	280:17	amendments
15:14	30:21	229:11	Alabama	26:23
16:17	31:17 51:5	246:20	2:5	American
17:21	affirms	247:9	alerted	60:3, 7, 14
22:12	275:20	248:10, 14	17:18	amount
23:12, 17	276:10	250:5, 21	alive 94:22	185:22
26:15 27:4	African 5:2	252:2, 12, 15	all-comers	201:12
32:19 86:9,	7:13 167:9	253:9, 13	171:7	234:15
21 118:4	168:16	254:4, 21	ALLEN 2:3	240:7 248:3
137:2	170:2	agreed 9:4	9:13, 16	amounts
164:21	280:15	11:7 14:21	10:10	45:24
165:18	African-	43:10	alterations	analyses
273:18, 24	American	61:22	254:13	164:19
275:20	169:13	272:13	amend	analysis
276:9	170:3, 14, 22	agreement	32:18	17:9 64:21
additions	171:2, 6	11:5, 11, 21	Amended	65:6, 18
117:23	173:3	12:15, 21	3:15 4:8, 9,	132:19, 22
additive	174:3	13:1, 5, 20	12, 15 20:5	133:2
144:15, 23	175:2, 6	14:3, 11	26:6 28:10,	134:9, 17
145:13	183:3, 10	15:5, 16	13 29:12	135:5, 22
152:3	184:2, 17	24:10 228:9	31:22	143:6
adds 140:24	185:16	ahead 25:7	34:19 37:1	164:22
219:16	186:11, 14	35:6, 12	70:19 71:8	165:7
adequate	187:9, 11, 22	36:4 43:13	72:8, 14	170:1
189:21	agar 250:1	78:21	85:21 97:1	177:1, 7
adequately	agency	89:18	105:1	264:9, 13
235:21	47:24 213:7	115:9	115:16	275:13
adjourn	ago 10:23	166:21	122:20	276:5
24:20	30:3 49:19	172:16	123:13	277:10
adjourned	78:8 80:10	175:11	124:14, 19	analyze
289:14	106:8	227:24	125:12	191:6
adjusted	110:3 129:5	233:21	127:7, 14, 22	analyzed
205:5	agree 13:14	Akhtar	128:5, 19	228:21
advance	21:15	284:7	130:2	253:23
17:4, 19	24:11	al 4:22 5:4,	135:13	Ancestry
19:13 23:2	144:9	9, 15, 19, 23	136:8	5:3 7:13
106:13	148:15	6:4 7:14	178:10	167:9
243:4	181:6, 8	142:16	215:15	

168:16	answers	approximate	ASHCRAFT	assistance
280:16	293:8	63:5	2:7 9:18	21:20
and/or	anticipate	approximatel	162:3	associated
144:15, 23	31:1 32:12	y 30:3	aside 212:8	51:1 53:12
284:14	anymore	40:16 42:6	255:3	60:13
animal	118:22	45:24	260:24	141:8
65:19, 23, 24	Apart 42:20	289:15	asked 35:15	204:17
66:3 230:1, 9	appear 72:6	area 226:16	44:1 45:9	228:15
animals	APPEARAN	areas 118:8	52:11, 15	248:7
66:4, 7, 8, 12	CES 2:1	argue	56:10 62:7	Association
216:2, 4	9:11	172:18	99:5 106:7	5:5 154:2
219:6	appearing	article	129:19, 22	181:1, 22
229:14, 20	9:4	67:16 75:9	152:7	192:19
Ann 285:24	apples	135:12, 17	233:19	211:19
Anna	260:20, 24	148:2	237:13	224:6
128:15	applicability	163:21	241:18	associations
Answer 8:5	16:20	231:24	258:22	153:14
17:17	applicable	232:2	266:9	assume
32:10	19:3 22:21	articles	278:7	179:10
62:19	applied	29:2 68:10,	284:1 287:3	260:22
64:13	87:23 88:4,	19 74:16, 18,	asking	assuming
99:17	9, 14, 20	23 75:4, 6,	30:23	163:5 174:8
135:2	89:5	15, 18 76:5,	48:13	ATLANTIC
181:21	apply	7, 11, 17	88:24	1:9
185:24	202:15	77:19, 21, 23	103:9	ATL-L-2648-
186:2	Approach	Asbestos	132:2	15 1:12
209:9	5:14 130:1	5:9 49:6,	133:11	attach
217:4	206:22	11 50:12	150:4, 6	267:17
226:17	244:4	64:23 65:8,	224:11	Attached
234:7, 24	appropriate	20 66:5	238:13	3:14 71:7
235:24	104:16	131:7	239:5, 16	72:2
238:6, 24	163:7	132:9	241:4	291:12
239:3, 14	188:3	133:24	243:19	293:11
240:15	189:18	134:3	assay	attend 43:11
245:16	190:6	135:7, 15	228:23	attended
247:12	274:4 291:6	139:10	assertion	48:14, 19
259:1 278:9	approval	206:18	22:2	attending
answered	11:9 13:4,	207:8, 11, 15	assess 134:2	12:5
152:7	15	208:4, 8, 13,	146:1	attention
answering	approve	21 209:5, 14,	168:10	277:8
93:16	272:9	22 210:5, 13,	233:4	283:13
239:11	Approved	17, 20 211:4,	assessment	attorney
	1:20 290:5,	20 212:10	209:24	290:14, 16
	19	213:8, 11		291:16

attorneys	156:2, 13, 24	117:22	157:15	BEASLEY
33:9 61:7	160:18	118:2	175:22	2:3 9:13,
63:1 74:20	161:12	119:4	192:7	16 10:10
104:7	168:23	129:9, 12	203:7	beginning
213:1	173:14, 15	130:14	225:14	11:4
288:15	174:3	160:22	241:1	117:14
attributed	180:24	188:17	246:4	152:16
131:6 132:9	181:19	193:16	272:24	153:1
August 4:1	183:3	194:10, 22	273:6, 17	246:8
108:16	187:20	195:5, 6, 14	274:15, 21,	252:24
109:1, 7, 19,	188:13, 24	209:19	24 283:12	286:2
24 110:1, 4,	191:22	210:1, 14	Background	begins
10, 16, 23, 24	193:13	217:5	5:13	139:10
111:20, 24	196:2, 13	220:4	206:20	believe
112:7, 18	198:18	224:10, 14	262:3	15:23 30:6
113:1, 2, 20	204:15	225:5	BACON	37:19 40:2
114:3	217:8	226:10	2:16	65:22 66:9
122:11	218:23	230:6, 19, 22	bankruptcy	84:19
Austin 1:19	219:21	231:2	108:17	107:16
27:11, 12	229:5	232:4, 14, 19,	112:11	112:23
author	246:23	21 256:20	based	113:3, 7
104:20	250:15	258:9, 18	148:21	162:13
146:5	256:4, 6, 12	265:24	155:21	164:12
161:15	260:12	288:3	179:20	169:19
162:24	author's		185:14	171:1
163:10	190:24	< B >	191:13	176:20
189:23	248:4	back 13:7	248:3	181:17
191:11	available	15:17	262:23	193:4, 10
authorities	17:5 23:22,	26:18 35:1	basically	255:22
53:10	24 196:18	36:5 37:9	101:17	270:19
authority	237:16	43:21	basis 42:8	280:2
57:15	average	49:18	62:9 137:3,	282:18
authors	95:21, 23	58:16	17 197:7	believes
140:12	98:18 201:8	63:20 81:1	271:16	245:1
141:1	aware	94:18, 20	Bates 246:8	Bellin 39:14
142:21	17:15	98:13	251:6	40:13
145:10	24:18	100:6, 10	252:17	117:16
146:8	33:18, 23	109:15	battery	bellwether
148:13, 16	59:20 60:9	111:18, 22	250:16	17:9 77:9
150:16	61:1 66:2,	115:12	Bay 39:3,	275:14
152:2	6 68:9, 11,	127:13	13 40:13	benign 43:3
153:6	21 69:16, 20	128:17	117:16	best 247:3
154:8	77:14 78:6	144:12		290:12
155:16	89:2 94:7	145:23		

better	78:3 84:1	bring 27:22	11, 18 45:2,	156:9
143:22	87:6, 8	52:12, 16	21 46:1, 7,	157:2, 6, 7,
253:17	143:8	56:17	14 47:11, 19	24 160:16
beyond	153:14	101:15	49:7 51:2,	167:7, 8, 19,
226:15	211:11	117:24	6 52:4, 8, 10,	22, 24 168:5,
254:11	216:14, 15,	broad	14, 17 53:13	15 169:14
bias 151:19,	19 264:5, 7	97:13	54:4, 9, 12	170:1
24 168:23	Bondurant	158:6	55:4, 14	173:2, 10
big 146:4	4:11 6:21	159:1, 7	56:5, 6, 10,	175:6
175:19	28:18 31:5	Brought	12, 16 57:18	176:9
Billings	85:12, 16	7:8 52:10	58:1, 11, 18	177:24
39:1, 8, 9	87:20	267:19	59:5, 13, 23	179:5
40:14	88:10	269:19	60:2, 3, 8, 12,	186:21
41:15	125:8, 13	270:6, 11, 17	13, 14, 20	189:18
117:17	128:24	Buz'Zard	61:3, 15, 20	192:22
biologic	130:4	284:7	63:15	204:16
177:2, 6, 22	133:18	< C >	64:18	206:19
178:15	268:11, 14	C.V 115:15	65:24 66:7,	207:9
255:10, 13	born 90:22	116:17	10, 13 68:1	208:22
263:12	96:14	118:12, 19	76:12, 18	209:6
Biomarkers	bottom	118:12, 19	77:16 91:1,	210:8, 13, 18,
189:19	164:12	CA125 92:1	9 92:5, 15,	21 211:4, 20
bit 31:22	180:23	Cahill 1:20	19, 22 94:4,	212:10
115:3	251:21	290:5, 19	14 95:3, 7	213:8
136:7	281:9	call 34:23	97:15, 20	215:5, 20, 24
179:19	Boulevard	62:24 63:6,	98:24	216:5, 11
209:3	2:18	8, 10	99:11, 22	219:2
218:7 236:5	bowel 42:19	called 16:3	100:15	221:17
black	Bradford	48:8 70:4	101:7, 22	224:7
167:20	176:24	78:11, 17	102:4, 6	225:1, 18
blacked	177:7	102:9, 13	112:7	226:9, 11
109:24	178:20	281:10	117:17	227:16
126:11	BRCA1	calls 61:6,	130:10, 22	229:21
Blount	101:2, 7	23 63:12	131:21	230:2, 5, 11
83:16	break 25:4	112:10, 14	134:11, 20	248:7
BMI 153:14	30:14	Canada	135:8, 16	250:18, 19
board 59:4,	34:23	60:17	136:1	262:5, 17
12, 15, 17	35:21	cancer 4:20	141:4, 9, 14,	264:23
265:4	36:11	5:1, 2, 7, 11,	19 142:4, 5,	265:5, 18
boards	115:2, 6	18 7:12	14, 23 143:7	266:5
264:13	274:15	39:24 40:1	144:8	280:14, 15
body 57:12,	breast 102:6	41:10, 14, 17	145:7	281:19
16 68:14, 24	briefly 9:8	42:19, 24	152:9	284:18
69:6 77:20	17:2	43:1 44:6,	154:3	

cancers	76:19 77:4	190:11, 17,	266:4	Center
43:1, 2, 4, 5	86:12, 24	20 193:15	284:21	39:23, 24
102:5	87:24 89:6	195:18	caused 54:5,	40:1, 8
171:13	97:19	266:2	9 130:21	41:10, 15, 17
172:20	111:11	Case-	131:20	44:21
228:15	118:13	Specific	250:9	117:17
252:5, 7	119:9	4:11, 14, 17	causes	certain 52:6
caption	140:23	6:15, 18, 21	60:19 68:2	certainly
15:2, 7, 14,	158:22	20:12 86:1	141:10	20:15, 18
22 123:18	160:13, 15	125:7, 13	210:13, 17	21:12 56:4
126:10, 15	166:18	126:24	230:10	59:3 95:11,
caption's	194:14	127:8	causing	14 108:22
125:2	205:13	128:6	141:3	148:24
carcinogenici	207:6	267:7	142:22	177:14
ty 223:8, 13	213:5	268:4, 14	160:16	208:12
carcinoma	219:7	274:1	167:19	238:6
168:8	221:13	catch 74:5	226:11	245:11
251:24	227:9	112:10	cell 171:15	CERTIFICA
Care 40:1	232:14	Causation	172:21	TE 290:2
41:11	249:13	3:18 11:13	173:9	Certified
44:10	254:15	12:2 78:9	175:18	1:20 290:6,
45:23	265:11	80:4 87:24	185:8	20
137:5, 8	273:23	88:5, 10, 15	218:3	certify
career	275:18	129:4	250:18	290:6, 10, 12
249:21	276:16	177:17	253:16	293:5
carefully	case-control	214:9	cells 5:19	cervical
291:4	151:13, 16,	221:15	6:3 215:6,	43:4
caring 44:5	22	227:11	18 216:8, 12	cervix 43:6
46:4	cases 47:10	228:2	218:24	216:11
Carrying	58:13 64:1	247:1	219:9	chair 45:8
165:15	77:9 89:5	284:17	221:21	challenges
Carter	102:5	cause 51:5	223:18	103:20
127:1	110:22	54:12	227:14, 17	146:11
Case 1:13	111:5, 8	59:23 60:2,	228:7, 13	challenging
25:24	114:3, 19	4, 12 131:21	236:16	179:19
30:19 31:3	123:20	134:11, 19	248:6	chance 93:1
36:23	154:24	135:8, 24	250:17	94:13, 17
37:18	160:24	141:13, 19	252:11, 14	172:3
46:13 47:9,	162:21	157:3, 5, 7	253:4, 22	change
16 64:17	164:7	207:8	284:16	37:24 38:3
66:17 67:4,	169:2	210:21	cellular	44:9 87:22
11 68:13, 23	176:1	221:16	228:23	88:3, 8, 13
69:19, 24	187:3	226:9	254:3, 9	117:3
70:7 73:1	189:15	248:15	284:14	222:7

223:18	243:15, 22	clarification	close 11:15	coming
292:3	280:4, 21	72:22	204:7	34:23
changed	chemotherap	270:21	closely	94:18
26:8, 24	y 44:15	clarified	54:23	280:21
37:14	cherry-pick	146:3	Coalition	commenceme
44:15	240:8	clarity	58:18, 23	nt 290:7
51:18	choice 79:12	81:13 158:9	59:13	commencing
72:19	choose	Clarke-	co-culture	1:19
87:11, 15, 19	23:14	Pearson	5:18 215:5	comment
109:17	chose	61:5 63:11	cohort	20:4 23:20
117:15	chose	classified	168:21	86:11, 23
changes	182:23	150:7	169:1, 2	246:18, 22
117:23	188:9	classify	196:3, 15	248:13
129:13	200:9	148:8	co-lead 10:9	249:8, 9, 12
217:15	228:18	clear 11:8	colleague	251:22
218:13	chronic	21:24	51:9 190:15	252:17
219:20	157:6	22:21 24:7	colleagues	253:21
221:18	circle 36:5	62:11, 13	50:8, 22	Comments
222:1, 12	145:23	73:8 74:7	51:3, 10	6:5, 10
223:5, 14, 16	circumstance	81:14 94:8	Colony	166:12
224:1	s 242:22	140:16	247:2, 18	232:5, 18, 22
225:4	citation	163:23	250:2	233:6
226:4	212:22	171:3, 15	column	236:21
230:3	213:17	172:21	180:22	237:4, 8, 10
253:3	cite 31:12	173:9	184:5, 8, 16	240:8
254:1, 2	32:14	175:17	278:14, 16,	246:17
284:13	68:12, 22	185:7	17 279:16,	249:3
291:11	69:11, 18, 21	222:22	17	251:4, 11, 21
293:10	77:18 78:2	234:11	combined	Commerce
changing	104:24	238:20	174:9	2:4
222:5	144:13	243:2 283:7	come 32:22	commercial
characterize	209:11	clearly	56:5 94:20,	228:22
78:15	229:4	146:7	21 98:12	commission
charged	263:15	clerical	216:24	293:21
106:5	265:17	79:12	252:6	committee
chart 54:22	284:6	client 11:9	274:15	9:20 10:6
277:14	cited 210:23	13:4, 16	286:5	common
285:20, 22	citing	Clinic 39:9	288:12	46:6 144:6
286:7, 9, 10	144:13	40:14	comes	167:23
chat 233:11	City 2:19	clinical	179:14	186:24
238:2, 3	45:17	254:15	comfortable	230:1
239:21	claim 229:5	clinically	93:16	communicate
240:13	250:3, 9	254:15	ComHealth	d 12:12
	claims 61:2	clinics 45:1	39:16	47:23

56:23 57:7, 11 communicati ng 58:17 communicati on 96:3 communicati ons 10:21 13:12 51:19 communities 137:4, 22 Community 40:3, 10 45:15 companies 103:1, 10 137:9, 12 138:7 company 70:4 102:8, 12 138:5, 23, 24 139:5 company's 70:13 compared 74:10 152:11 174:10 256:1 261:8, 24 263:7 comparing 209:20 comparison 183:4, 16 260:17 261:12 compensatio n 281:17 CompHealth 39:17, 18 137:10 138:4, 10, 24 139:4	completed 18:3 30:1 276:8 286:19 completely 9:9 complicated 240:5 complying 274:13 comprehensi ve 143:4 computer 238:5 concern 56:13 247:23 248:16 concerned 122:9 191:18 concerning 76:18 133:22 concerns 57:23 conclude 274:9 conclusion 152:17 153:2 167:18 202:14 204:13, 23 248:5 252:23 253:7 conclusions 248:18 condition 131:6, 12 132:8, 15 144:7	147:12 254:20 conditions 42:21, 22 44:3 253:24 conduct 67:9 229:13 250:16 conducted 1:18 66:3 143:4 275:13 conducting 231:19 confer 18:9 confidence 158:11, 14, 16 160:7, 10 171:8 172:2 174:5 175:3 203:3 260:16 confident 84:21 confirm 146:19 230:13 confirmation 108:6 147:13, 17 148:4, 11 150:17 conflict 161:16 162:22 189:13 191:10 195:23 220:18 231:13	281:10 283:1 287:5, 8 confused 159:22, 24 203:12 conjunction 195:7 connection 46:17 193:23 194:12 232:6, 14 connects 213:8 consider 140:4 147:9 148:2 155:12 162:19 175:4 177:5 178:8 249:11 consideration 177:16 233:1 consideration s 177:20 Considered 3:14 16:2, 10 18:24 20:6 28:4 29:1, 3, 7, 8 33:18 34:17, 20 35:4 37:2 71:1, 6 72:1, 7, 17 73:16 81:18 82:9 84:3, 9	177:1 209:15 241:12, 14 considering 18:10 133:23 considers 143:6 consistent 121:6, 19 172:10 284:10, 17 consistently 243:20 Consolidated 1:11 Consortium 5:3 7:14 140:11 167:9 168:13, 16 280:16 consultant 231:17 consultation 120:24 consulting 47:4, 5 Consumer 2:21 contact 216:24 contacted 139:3 contain 125:24 232:17 contained 130:12 contention 20:23 223:6 256:24
---	---	--	---	--

context	copy 28:1	178:6	Counsel	Court's
240:10	71:15 74:2	180:6	9:10 17:14	274:13
242:10	82:22	181:4	18:5 19:12	cover 22:3
245:10	116:11	183:7, 20	20:14 24:2	102:3
continue	126:9, 10	184:23	33:3 57:1	273:20
18:13	139:20	185:18	61:23 78:8,	covered
223:23	154:1	187:23	24 105:6, 19	35:10
239:9	161:9, 21	193:6, 7	106:5	36:18
276:14	193:5	195:24	120:24	102:1
continued	206:6, 7	196:4, 24	121:5, 18	270:15
92:1	234:12	197:7, 10	231:4	covers
continuing	239:8, 17	198:14, 16,	271:13, 15	113:19, 21,
247:11	241:19	20 199:13	275:8, 11	23
contrary	242:16	200:3, 8	277:24	Cramer
53:10	245:12	203:23	281:23	160:19
contribute	Correct	207:11, 12,	290:14, 16	162:1
210:5	12:23	15 208:4, 5,	counseling	Cramer's
218:24	28:19	8, 17, 18	46:21	162:20
contributed	74:15	215:18, 19	counsel's	creation
130:21	82:10 90:6,	217:19	274:6	264:9
131:20	7, 21 91:2, 3,	218:14, 19	country	credentialed
191:1	9, 10, 13	220:9, 10	38:12	138:5
	97:16, 17	221:21	137:18	
contributions	100:11	223:3	COUNTY	credentialing
190:24	103:4, 15	237:5	1:9	272:11
controls	117:21	256:17	couple	criteria
155:1 169:3	121:14	258:2	36:13	197:22
convenience	122:18	259:5, 6, 8	118:20	200:6
85:1	146:20	262:18, 24	179:2	cross 158:5,
convenient	147:3	263:14	233:6	7, 10, 14
242:17	149:8, 13	265:22	250:13	171:8
conversation	150:11	278:1, 2	course	crosses
s 10:20	151:14, 19	287:7, 11, 23	56:15	158:24
conveyed	152:5	288:3 293:7	COURT	159:4
58:22	153:8	corrections	1:1, 6, 21	172:2 204:8
coordination	154:11, 13	291:5, 7	9:2 10:11	crossing
10:24	155:10, 18,	293:10	11:3 12:22	158:17
11:17 12:7,	23 169:3, 8,	correctly	15:3 22:8	Crowley
20 13:5, 20	18 170:6, 18	140:18	24:19	80:24
14:6	172:4	correlation	82:14	crystal
copies	173:4, 10	252:22	290:6, 20	283:7
28:20 29:2,	174:6, 18	253:6	291:20	culture
6, 11 81:10	176:1	corresponde	courtesy	227:19
279:5	177:3, 8, 18	nce 232:16	23:3	

cumulative 144:15, 22 145:12 152:3 cured 93:1 current 33:1 102:19, 21, 22 116:12 117:11, 15, 24 286:10 currently 89:13 99:1, 11, 22 101:20 137:10 138:3 Curriculum 4:1 115:23 116:3, 12 117:2, 8, 23 cytometry 218:15 cytoreductio n 42:17 < D > D.C 2:10 daily 196:17 197:7, 8 199:20 256:2, 11, 15 257:8, 19 259:23 260:7 261:10, 19 263:18 Daniel 160:19 162:1 data 94:17 168:14 182:2	183:23 184:1 185:5, 20, 23 196:3, 14, 18, 21, 23 197:1, 3, 4 198:17, 20 199:1, 10, 12, 16 207:13 208:2, 7, 15 209:11 210:14 211:23 212:10, 11 217:4 240:3 248:3, 9 250:3 252:4 253:16, 17 257:12 259:7 263:19 265:20 277:22 284:9 dataset 258:2 259:13 date 1:19 14:21 30:1 59:1 117:4 126:1 290:11 291:9 293:16 dated 29:19, 20 109:6 124:8, 15 127:15 128:20 136:9 290:21	dates 29:16 68:8 112:22 113:4 Daubert 82:3, 4 83:12 Davis 5:4 7:14 105:2 165:8, 11, 12 166:8, 13, 14, 17, 19 167:1, 10, 14 168:2 177:21 178:13, 22 180:9 191:8 192:11 276:23 277:11 278:6 279:24 280:6, 17 281:5 day 234:18 271:18 293:20 days 17:24 18:22 19:13 23:7, 23 24:4 38:24 78:7 80:10 291:16 de 10:9 deactivation 223:17 deceased 85:17 December 4:1 30:7 106:1 109:1, 19 110:16	113:23, 24 114:7 Declaration 220:13 decreased 204:2 deemed 291:19 deeper 77:11 Defendants 2:20 10:2 14:5, 17 15:12 17:23 18:16, 21 19:12 23:23 25:24 273:9 277:24 defined 200:14 201:5, 11 definitely 190:3 257:7 definition 202:21 256:9 degree 23:10 62:19 277:20 demonstrate 228:24 284:20 demonstrate d 156:8 dense 241:6 Department 161:10 depend 191:10	Depending 149:11 depends 149:9 216:18 DEPONENT 293:2 deposed 26:9, 17 37:8 47:13 49:17 deposing 291:16 deposition 1:18 4:5 7:9 8:2 9:3 12:3, 6, 19 13:19, 23 14:18 15:8, 17, 20 16:13, 21 17:19 18:2, 14 19:3, 13 20:17, 23 21:19 22:5, 6 23:1 24:14 26:1, 18 27:7, 23 36:20, 24 37:13, 20 38:1 49:18 57:21 71:5 80:2 84:20, 23 93:8, 11, 18, 22 104:12, 22 105:14 106:13, 24 107:15 109:13 110:14 116:2 119:14, 16,
--	--	--	--	--

17 120:11, 17 124:18 125:11 127:6 128:4 136:19 142:9, 12 167:5 192:15, 18 206:15, 17 214:24 215:2 221:1 236:12, 19 243:5 251:9 264:24 266:21 267:6, 18, 20 268:3, 13, 24 269:10, 20, 22 270:7, 9, 11, 18 271:13 273:8, 23 280:2, 11 289:14 291:3, 13, 17, 19 depositions 11:3, 20 18:23 22:19, 22 23:9 84:2 deps@golko w.com 1:24 describe 89:4 284:5 described 224:2 describes 247:4 283:19	DESCRIPTI ON 3:12 270:16 271:8 287:3 descriptions 161:11 design 191:6 designate 71:24 79:23 120:6 142:8 167:1 192:15 206:14 220:23 236:9 246:10 266:13, 18 267:4, 23 268:10, 20 269:6, 17 270:4 designation 270:16 designed 146:7 191:19 despite 13:11 detail 75:12 details 93:21 103:9 determinatio n 55:10 determine 26:7, 14 55:7 190:7 200:10 256:14 determined 54:8, 11 134:11, 19 135:7	developed 118:3 diagnosed 131:4, 11 diagnosis 91:2 92:5 94:7, 10 95:2 96:17 98:24 99:11, 22 148:20 differ 153:16 difference 155:10 157:10 158:6 170:6, 17 174:22 181:1 183:5, 12, 18 200:24 204:10 257:7, 17 differences 187:4 263:7 different 30:24 94:1 125:5 129:21 154:24 173:21 176:3 185:21 187:18 191:13 200:2 209:3 218:3 219:4 256:16 260:5, 10, 18, 21	differentiate 254:17 differently 130:3 173:22 difficult 169:22 229:19 dinner 61:8, 9 271:19, 22 dioxide 223:2 225:22 226:9 direct 82:18 143:22 246:24 277:4, 7 283:13 Direction 8:5 directions 182:19 directly 67:15 288:12, 17 disagree 21:15 disagreement 228:10 disclose 79:1 163:22 190:3 195:19, 20 288:7 disclosed 19:10 47:8 84:22 287:9, 10, 15, 16 disclosure 161:5, 8	162:22, 23 163:8, 11, 17 164:5 188:24 189:14, 21 190:1, 8, 21 191:10 220:12, 19 273:11, 12 281:11 282:2, 8, 21 discover 21:10 discuss 21:11 26:5, 23 52:9 59:4, 12 101:13 178:19 discussed 10:23 48:21 50:9, 12, 20 51:2, 14, 23 56:23 100:14 discusses 53:21 discussing 45:20 68:13 185:2 discussion 14:12 43:16 51:11 59:15 63:18 101:1 144:1, 2, 5 145:18 152:15 168:24 178:21 180:20 240:21
--	--	---	---	--

245:23	DNA	245:7	279:17, 19,	114:1
272:21	221:23	246:6, 9, 12	20	115:1, 14
273:2, 7	222:1, 5, 9,	Documents	doses 179:7,	116:9
289:4	12, 20, 21	8:8 18:23	9	119:23
discussions	Docket 1:11	19:2 29:9,	Dr 6:13, 16,	120:10
22:7 46:11	Doctor	12 69:23	19, 22, 24	122:8
52:19 53:4,	130:24	70:5, 12, 13	7:3, 4, 8	123:3, 9
9 62:5, 8, 15	154:21	79:7 121:1,	11:4 14:18	124:3, 6, 13
100:2	158:10	4, 19 238:21	16:3 17:3,	125:18
166:7, 8	193:4	242:23	7, 12, 15	127:3
Disease	235:5	244:16	19:5, 7, 9, 21,	131:22
5:12 95:16	236:3	255:3	23, 24 20:11,	142:21
97:10	243:6, 7	doing 32:3	19 21:11, 16	144:1
172:20	252:21	38:14	22:10	146:18
177:16, 18	255:3	73:23	23:11, 24	150:21
206:20	266:12	91:12, 24	25:7, 17, 22	162:19
diseases	271:11	92:12	27:9 29:14,	164:10
43:6	272:9	99:24 291:8	18, 20 32:14,	166:3, 23
	277:1	dollars	15 33:12, 13,	174:2
disingenuous	280:1	103:24	14 34:2, 5,	189:6
238:11, 18	281:12	dose 179:13,	11, 24 35:2,	190:8, 15, 24
dismissed	283:11	17, 21 180:1	14, 17, 23	191:8
108:18	285:4	dose-	36:9, 18	193:18, 20
displaying	doctors	response	43:24 61:4,	195:16
72:23	44:18	177:2, 5, 15,	17, 18 62:15,	196:18
dispute	document	22 178:14,	16, 17, 22	210:14
16:19	71:18, 23	21, 22 179:3,	63:2, 9, 10,	211:5, 10, 18
disputes	79:23	20 180:6, 10	19, 20 64:10	212:1, 2, 8
18:12	116:16	181:20	65:13	214:16
distinguish	119:12	182:10	71:19	219:22, 24
158:18	120:16, 20	183:16	73:10, 16	230:22
	121:13	187:14, 21	77:5 79:5,	231:13, 18
distinguished	123:19	188:4	11, 19 80:24	232:4, 15
141:17	125:5	255:18	81:2, 3, 6, 15	233:17
DISTRICT	128:18	256:5	82:5 83:21	237:4, 13, 22
1:1	233:19	257:2, 13	84:7 85:3	238:3, 23
dive 77:11	235:6, 20	258:19	91:6, 11, 23	239:23
diverse	236:4, 7	259:16, 17	92:23 93:7	240:13
250:16	238:9, 13, 15	260:14	104:2	241:7
divided	239:1, 17	261:2	106:11	242:1, 15
176:2	240:2	262:23	107:7, 17	244:12
DIVISION	241:6, 9	277:11, 16,	108:10	245:1, 13
1:9	242:6, 16	19 278:9, 12	109:4, 22	248:17
	243:4, 12		111:15	250:11

266:22	earlier	efforts	245:18	engaged
267:8, 19, 23	69:10, 14	132:24	289:8	139:5
268:5, 10, 15,	211:3	egg-laying	Emi 5:23	ensure 9:8
20 269:1, 6,	255:15	66:9 229:22	105:2	entire 75:9
11, 18, 23	271:11	eight 279:5	213:18	95:5
270:6, 11, 18,	273:16	either 49:11	214:1, 15, 19	Entirety
22 273:19	288:23	52:11	220:22	7:6 75:6
274:17	easier 79:8	61:17	221:5	244:21
275:6, 13, 24	Eastern	102:4	225:21	270:5, 10
276:4	1:19 24:20	135:24	284:7	entities
279:18	120:12	142:2	employee	139:3
280:8, 24	edit 191:7	145:8	290:14, 15	entitled
281:15, 24	editing	152:12	employment	16:6, 7, 9
282:11, 20	191:3	165:11	38:4	72:14, 16
285:23	editorial	178:20	endometrial	156:13
286:11	264:13	186:2, 23	43:1 185:8	237:23
287:4, 10, 19	educating	204:11		241:10, 23,
288:9	46:22	218:4	endometrioid	24 242:10
drafted	education	233:16	171:15	entity 70:5,
49:1, 5	46:10	243:4, 21	172:21	6 191:20
63:20	117:12	245:9	173:8 185:9	entry
draw	effect 5:15	249:5	endometriosis	111:24
252:23	152:4	254:24	s 4:21	
253:7	158:8	263:8	141:7, 21, 23	Environment
Duces 4:6	160:5	electronic	142:15	163:6
119:18	175:20	28:1	143:5, 13	environment
Due 9:6	179:20	eligibility	144:6, 22	ally 220:16
172:3	181:24	197:14, 22	145:6, 12	EPA 212:19
duly 25:11	185:7	200:6	146:9, 11, 15,	Epidemiolog
290:7	204:2	Ellen 61:8	19, 23, 24	y 161:11
durable	215:3, 22	272:1	147:3, 6, 10,	163:6
254:13	218:7, 8, 10	e-mail	18, 22 148:3,	164:11
duration	219:8, 17	10:20	12, 20 149:3,	189:19
179:8, 21	226:13	12:17 13:2	4, 6, 18	epigenetic
181:3, 18, 23	Effects 4:18	19:22	150:1, 8, 14,	223:4, 15
186:3, 5	5:21	107:21	18 152:5, 10	225:3
187:21	142:13	232:15	153:18	epigenomic
188:2, 6	217:17, 21	233:15, 23	154:4, 8	5:21 221:3
duties 44:23	218:22	235:8, 12, 13	155:1, 5	Epithelial
DWC	221:3	237:15, 22	156:5, 10, 16	5:1 6:3
161:22, 24	227:12, 20	239:22	157:2, 19	7:11 167:7,
	252:10	240:14	158:1	23 228:7
< E >	efficient	243:22	159:2, 20	236:15
	274:19	244:6	160:11	248:6

252:1, 14	194:18	excused	251:9	68:15 69:1
253:4	195:4	289:13	266:18, 21	78:4 80:23
280:14	219:16	Executive	267:4, 6, 23	123:14
epithelium	exact 143:2	10:6	268:3, 10, 13,	124:15, 20
227:13, 14	exactly	exercise	20, 24 269:6,	125:13
errata	11:15	272:12	10, 17, 22	127:8, 15
291:6, 9, 12,	108:21	Exhibit	270:4, 9, 21	128:6, 19
15 293:12	EXAMINAT	3:14 34:3,	271:5, 9	160:23
especially	ION 25:14	5 35:15, 18	275:23	162:2, 21
228:16	107:12	36:2, 10	276:3	163:24
ESQUIRE	275:3, 8	70:23 71:2,	280:2, 11	164:6
2:3, 4, 9, 13,	285:16	5, 7, 24 72:2,	exhibits	188:18
18	290:7	24 73:10	113:17	189:14
essentially	examine	75:5 79:23	129:19	190:10, 16,
84:23	23:11	80:2 84:2	130:13	17 193:14
establish	81:21	85:6	233:10	194:13
160:4 253:2	252:9	106:21, 24	266:14	195:1, 17
estradiol	258:16	110:4, 9, 14	267:18	220:3, 8, 12,
217:18, 22,	examined	111:2, 19, 23	270:16	14, 15
23	25:12	113:18	273:14	230:23
estrogen	81:20 93:7	115:24	277:3	278:24
218:6, 9	107:14	116:2	exist 113:9	283:3, 8
et 4:22 5:4,	108:23	119:13, 16	expanded	287:21
9, 15, 19, 23	258:14	120:3, 6	100:10, 21	expertise
6:3 7:14	example	122:8	expect	118:4
142:16	82:2	124:13, 18	230:11	226:16
167:10	Excuse	125:9, 11	expectancy	254:11
192:23	35:13 43:8	126:14, 21	95:19, 21	experts
206:22	89:9 93:5	127:6	96:1 98:16,	11:14 14:6
215:6	97:8	128:1, 4, 18	18, 21	18:23, 24
221:5	106:19	136:18	expected	63:24
236:16	140:10	142:10, 12	11:10	140:13
280:17	151:16	167:2, 5	experience	266:1
e-tables	154:15	192:16, 18	117:12	expires
79:6	170:8	194:12, 24	experiencing	293:21
evaluate	194:17	197:17	99:1	Explain
277:19	209:17	206:14, 17	Expert 1:13	64:6 200:23
evaluated	211:24	214:23	4:8, 12, 15,	explained
153:7, 22	221:18	215:2	18 11:3, 13,	254:2
evidence	225:10	220:23	22 47:8	exploratory
97:9	237:11	221:1	52:20	42:15
130:20	247:10	234:5	60:24	Export 3:15
131:19	283:14	236:9, 12, 19	61:14	71:8
134:24		246:10	63:13	

exposed	228:11, 14	172:23	Federal	160:3
66:4	254:16, 24	173:22	22:23	166:14
209:13	255:1	177:12	212:19	173:15
210:6	extend	fail 291:18	213:4	175:8, 12
216:22	46:12 274:4	fair 176:6	Federally	179:23
Exposure	extensively	238:17	1:20 290:5,	183:11
5:9 7:1	274:11	239:6	19	193:8, 11
17:8 19:6	extent	241:15	feel 34:5	207:2
29:13 49:2,	11:12, 22	242:11	93:16	212:22
6, 12 50:9,	36:6	249:14	157:8	215:10
12 65:13, 20	extracted	258:11	211:15	220:17
131:7, 13	260:8	fallopian	fees 105:16,	221:9
132:9, 16, 20		197:10, 24	19 163:12	230:18
133:5, 24	< F >	198:4, 14	189:7	231:5
134:3, 10, 18	facilities	199:22	190:4, 8, 19	finding
135:6, 15, 23	39:20	201:19	Felix 48:8	155:15
139:11	40:18	202:7	felt 163:7	160:9
141:23	41:22 42:3	252:1, 6, 11,	Ferraro	172:3
145:5	54:16	14	162:2, 8	175:4
177:15, 17	117:18	familiar	fibrous	176:8
196:17	138:21	76:3 78:13	50:16	180:6
204:18	facility	102:7, 11	fifteen 94:10	183:17
206:18	45:12	family	fifth 278:15,	205:13
207:11, 14	fact 19:14	101:11	17	246:24
208:3, 6, 20,	141:16	143:9 154:2	figure 218:1	258:9 279:9
24 209:5, 21,	142:2	far 13:18	fimbriae	findings
22, 24 210:4	213:9 220:7	14:21 22:8	252:6	77:12
211:4	facto 10:9	56:23	fimbrial	146:20
214:10	factor 51:4	70:17	252:1	158:18
219:17	55:13	114:18	finalized	159:12
223:1	57:24	119:4	60:17	175:1
227:20	141:18	129:9	286:18	178:9, 14, 22
229:7	142:3, 24	140:17	finally	181:7
247:2	144:8	148:21	141:21	183:2
248:5	177:7	158:16	288:9	205:15, 16
268:21	182:19	163:3	financially	224:7
269:1	Factors	169:24	290:16	fine 154:21
275:12	4:20 68:1	286:21	find 67:12,	finish 273:4
284:16	94:8	287:2	16 74:17	finished
expression	142:13	fashion	83:3 95:10	154:17, 22
218:14, 16	143:8	144:16, 23	97:6	225:11
222:7	144:14	145:13	139:17	firm 47:21
223:1, 7, 15	154:3	FDA 57:8	145:18	162:3, 9, 12,
227:22	155:14	210:16	152:3	14 163:12

190:4, 18	161:21	254:17	159:15	285:2
195:21	174:9, 20	279:22	163:2, 15	287:13
firms 164:1	176:3	follows	165:3, 21	288:5
189:7 190:9	185:3, 21	25:12	169:5	293:10
first 12:8	244:17	follow-up	170:20	formal 50:5
13:17, 18	245:5	274:16	172:6	118:7
19:19	274:17	275:7	175:10	formation
37:20	five-minute	276:22	176:14	247:2, 18
41:12	63:6	285:9	177:10	250:2
49:18	five-page	footnote	179:1	formed
70:23	240:2	198:9, 11	180:12	130:9
80:11	241:6	foregoing	181:13	276:8, 11
104:19	245:7 246:9	290:10	182:12	forming
107:7, 15	Fletcher	293:6	191:16	19:1
110:7	284:8	forest 277:8,	194:16	forms 54:18,
111:24	flow 218:15	17 278:16,	195:4	21
113:19	focus 76:14	18 279:1	196:6	forth 290:12
117:19	136:7	forgive	197:12	forward
120:9	174:24	277:5	199:15	15:5 18:2
124:5	183:1	form 32:6	200:18	20:19 21:7
125:24	focused	33:21	202:18	22:14 24:12
127:14, 19	76:12 210:4	53:15	204:5	found 74:19,
129:2	Focusing	58:12	207:17	20, 23 97:9
136:21	153:20	61:22	208:10	152:8
138:16	260:24	65:10	209:18	153:6
144:4	Folder 3:16	76:21 89:9	210:10	154:9
160:20	79:9 80:3	91:15 97:4	212:14	156:2, 14
161:5, 18, 20	84:24	98:3 99:15	217:2	169:12
164:17	107:23	103:17	222:16	181:9, 22
166:11	108:14, 24	133:8	224:9	183:4, 21
184:4	folders 78:8,	134:5, 22	229:16	187:24
214:22	10, 20, 23	135:10	231:7	200:20
246:6	79:2, 16	136:3	232:9	201:8, 13
249:1	follow	140:7	248:20	202:20
251:22	94:20	145:1	253:12	204:9
258:23	98:11	147:15	256:19	205:8
259:4	113:12	148:6	257:4, 15	213:1
262:14	163:19	149:15	259:10, 19	225:4
266:16	278:6	150:21	261:4	228:10
275:12	289:11	151:21	263:2	248:17
281:9	Following	153:10	264:17	259:16
five 49:19	146:17	155:20	266:7	262:16, 23
63:1 94:10	202:4	156:18	276:19	foundational
95:6 104:8	253:23	158:3, 21	282:5, 16	93:10

four 23:10	122:18	89:13 90:6,	130:6	159:11, 19
29:5 31:22	123:8, 23	12, 18, 24	136:8	160:10
32:13	125:22	92:14 94:3	194:4	167:6
88:20	136:11	95:3 96:4	211:23	169:14
104:8	140:2	99:3, 5, 9	219:3	170:2
107:16	167:14	100:5	266:17, 22	181:2, 3
122:10, 16	201:16	103:3	269:7	198:5
129:7, 18	206:12	128:2, 6, 12,	270:23	GEREL 2:7
130:12	212:3	15, 21 129:1	277:2	9:18 162:3,
200:14	227:5	130:5	278:24	11
201:3, 4, 9	246:13	131:18	280:13	Gertig
273:3	251:17	132:2, 15	generally	258:1, 5, 18
278:15	258:6, 11	133:15	26:11	259:3, 16, 23,
four-hour	259:24	220:9	31:13	24 260:6, 13
274:14	FT 252:10	268:1, 4	42:11	261:1
fourth	full 38:8	Gallardo's	52:23	263:13, 18
279:16, 17	functional	95:19 98:23	55:11, 14	getting
fragrances	253:3 254:1	gather	56:2 94:12	55:14
50:17	funded	51:20	101:24	71:15
free 34:6	191:20	gears 136:6	138:8	116:14
95:16 238:4	funding	gene 76:13	172:22	190:4
frequency	162:4	100:14, 16,	251:23	206:8 279:2
178:6	164:1	21 101:21	genes 101:4,	get-together
179:6, 21	231:18	102:8, 12, 16	9 102:3	272:4
181:2, 18, 23	further	103:4	217:15	Give 34:8
182:6, 9	11:21	218:13, 16	222:7	35:23 45:9
186:3, 19, 23,	18:10 22:7	223:1, 7, 15	223:16, 17	46:10 48:7
24 187:21	23:8 32:13	General	genetic 77:7,	74:4 96:11
200:3, 7	60:5 75:11	3:16 4:8	10 100:5, 20	116:19
262:6, 17, 24	142:1, 7	6:13 7:10	103:14	139:23
Frequent	253:1, 23	11:13 12:1	276:5	175:13
5:6 192:20	271:7	14:6 28:13	genetic/epige	206:8
200:10, 13	285:3	50:24 71:9	netic 254:1	212:1
201:21	290:10, 12	72:24	genetically	216:10
202:1, 12, 15,		73:11	101:6	280:9
22 203:2, 22	< G >	76:22, 23	genetics	given 41:8
204:3, 17	Galardo	78:4, 9	76:6, 12, 18	45:5 50:5,
256:1, 8, 10,	31:4	80:3 88:15	77:12	15 122:16
15 257:8, 18	Gallardo	89:6 101:5	Genital	148:20
friend 45:8	4:17 6:18	104:5	4:22	162:19
front 10:7,	28:17	122:24	153:15	210:3
11 50:7	85:12, 18, 22	123:14	155:3	253:22
90:10	86:2, 15, 22	124:15, 20	156:9	254:19
93:19	87:16 88:5	129:3	158:19	273:5 293:8

giving 230:2 240:9 241:8 glass 29:15 go 18:1 20:18 21:7 22:13 24:12 25:7 35:1, 6, 11 36:4 43:10, 13, 14 75:11 78:21 89:18 113:12 115:3, 9 138:15, 20 142:7 166:21 172:15 175:11 186:4 192:2 195:23 227:24 233:21, 22 234:9 240:16, 17, 18 241:1, 20 245:3, 17 248:23 272:18 274:24 Godleski 219:22, 24 Godleski's 64:11 goes 72:4 82:2 94:13 142:2 184:3 185:1, 15 253:21 287:3	going 13:13 15:4 24:9 31:21 35:20 36:3 66:1 73:6 74:1 80:21 82:11 84:12 89:17, 19, 22 104:9, 15 106:10, 20 108:3 109:14 111:18 114:24 115:17, 22 118:19 119:12 120:5 122:20 123:7 137:23 192:1 201:6 216:19 226:16, 17 227:2 231:5 233:9 234:2, 4 235:8, 10 237:7 238:19, 20 239:13, 15 241:12 242:5, 23 244:5, 19, 21 255:19 273:4, 6, 15 275:10 285:8 GOLKOW 1:23	GOLOMB 2:13 9:21, 22 10:3, 4 13:23 14:8, 13, 22 15:15 Golomb's 15:10 Good 25:17, 18 65:23 66:11 91:12 94:17 115:6 138:6 140:5 189:20 gosh 216:17 Goshen 39:24 40:1 41:10 gotta 165:10 gotten 13:15 grade 171:14 gradient 177:2, 6, 23 178:15 179:6 255:10, 14 263:12 Grand 2:18 grant 162:4 164:1 greater 145:7 156:8 182:6 183:6 184:22 186:15 188:8 200:7 201:2, 5 218:8	Green 39:3, 13 40:13 117:16 grew 228:13 ground 81:24 group 48:5 50:7 57:12 59:21 60:10 141:1, 2, 16, 17 146:5 156:7, 22, 23 groups 260:21 261:8 grow 223:19 227:19 guess 16:3, 6 25:2 284:4 guinea 66:9 229:21 GYN 94:21 140:13 Gynaecologi cal 5:11 206:19 Gynecologic 6:9 41:7, 24 45:10 48:10 91:5 96:21 102:5 137:4, 7 144:6 251:5, 10 265:24 gynecology 44:23 < H >	H2O2 218:18 half 39:6 242:7 hallmarks 250:19 hand 117:10 handed 242:15 handwritten 119:7 Hannahan 250:20, 24 happen 66:8 172:9 happening 112:11 happens 35:22 happy 18:9 82:15 107:20 238:1, 6 240:15 242:19 hard 27:24 29:6, 11 73:22 74:2 81:10 82:21 146:13 149:17 179:8 233:2 245:12 HARDY 2:16 harmonize 198:15 Harper 6:3 105:3 226:21 236:16 284:1, 8
---	---	---	---	--

Harper's	25:6, 16, 23	120:5, 8	184:7, 12	243:1
250:11	32:11	121:8, 21	191:24	244:3, 15
hazard	33:24	122:3, 6, 19	192:7	245:17
201:23	34:10, 13, 22	123:3, 9, 21,	193:3	246:4, 11
202:9	35:9 36:3,	24 124:2, 11,	194:21	247:16
head 41:14,	15, 17 43:13,	24 125:6, 17	195:10	248:1
16 137:15	21, 23 53:18	126:8, 13, 19	196:9, 12	249:10
179:12	57:6 60:6	127:12, 21	197:18	251:3, 16, 19
heading	62:3, 11	128:10	198:6	253:20
237:9	63:4 64:14	132:4	199:4, 23	255:2, 6, 8
Health 40:3	65:3, 4, 16	133:10, 13	200:22	256:3, 23
60:17	69:12	134:7, 14, 15	202:24	257:10, 20
91:12	70:22	135:3, 19	203:9, 13, 16,	258:7, 15
137:12	71:12, 17, 22	136:5, 15, 20	19 204:12	259:2, 14
162:5	73:3, 9, 14	140:3, 20	205:9	260:11
196:22	74:3, 6, 8	142:6, 19	206:5, 13	262:1
197:2	76:9 77:2,	143:21, 23	207:1, 21, 23	263:10
198:24	17 78:21	145:9, 22	208:14	264:20
199:2, 18	79:13, 22	148:1, 9	210:2	266:10, 16
258:24	80:8, 17	150:5	211:1	267:2, 16, 22
259:4	82:1, 7, 17,	151:2	212:4, 7, 17	268:9, 19
263:20	23 83:13, 19	152:1, 13, 24	213:23	269:5, 16
265:21	84:4, 7	153:4, 19	214:3, 14, 21	270:3, 14
hear 11:10	85:2 86:18,	154:18	215:9	271:6, 10
heard 9:9	19 87:3, 9	155:6, 24	217:7	272:18, 24
13:7	89:12 90:7,	157:14	220:21	274:20
hearing	11, 19 91:18	158:15	221:8	276:18
24:22	92:3 93:9,	159:8, 18	222:23	278:4, 17, 21
43:12	12, 23 96:15	160:1	224:13, 17	279:2, 7, 13,
195:12	97:11	163:9	225:7, 20	21 280:22
288:2	98:14 99:4,	164:3	226:7	282:4, 15
heavy 50:16	8, 19 102:21	165:14	227:6	285:1, 7, 12,
131:12	103:2	166:2, 23	230:14	18 287:18
132:16	104:1, 17	168:1	231:11, 22	288:8, 20
135:23	106:10, 20	169:6	232:12	289:7
HEGARTY	107:6	170:11, 12,	233:14, 21	held 18:4
2:18 3:6, 7	108:2	24 171:23	235:1, 4, 9,	help 38:12
9:24 10:16	109:3, 16, 20	172:14	14, 17, 23	84:12
12:10	110:20	175:21	236:2, 8	137:19
13:21 15:9	111:6, 14, 17	176:19	237:2	138:17, 18
18:15	113:6, 14, 16	177:13	238:8	helped
21:14, 23	115:8, 12, 22	180:3, 15	239:7, 13	191:7
23:19	116:7, 24	181:16	240:16	helping
24:15, 23	119:11, 22	182:21	242:3	

75:13	4, 17, 21	228:6	identified	include
Hen 229:22	HO 218:18	236:15	26:16 27:6	21:1 32:24
Henry 41:13	hold 46:16	humans	52:19	48:12
hens 66:9	home 27:16,	219:6	85:20	67:24
229:22	17	224:12	101:9	109:7
hereinbefore	hopefully	hypothesis	150:16	166:7, 8
290:12	15:4	155:17	identify	172:18
Hershey	111:15	170:5, 16	27:4 134:9,	201:6
39:22, 23	180:18	172:1	18 135:6, 22	208:12
40:8, 9	Hopkins	hysterectomi	IHC 252:22	211:3, 9
44:21 45:19	81:4 83:21	es 42:14, 16	253:6 254:2	226:20
hesitated	210:15		IIA 95:4, 7	282:12, 20
32:8	hormone	< I >	III 95:11, 15	included
HHS 7:10	153:16	i.e 143:9	imagine	19:15 28:6
280:12	Hospital	250:19	67:24	33:17
281:4	39:14	IARC	Imerys 70:4,	48:12 72:8
high-grade	40:10, 12, 13	210:24	6	78:9, 10
167:21	102:1	idea 141:12		135:13
168:4, 8	117:16		immortalized	198:13
171:12	272:10	identification	227:15, 18	199:7, 8, 9,
173:3, 13	hospitals	71:10 80:6	immune	11 207:13
174:17	117:14, 15	107:4	215:24	277:16
183:2, 9	hotel 138:24	110:18	217:16	282:1
186:9	hour 18:11	116:5	219:9, 18, 20	including
187:9, 11	106:9	119:20	immunocom	10:21 31:3
251:24	114:24	124:22	promised	34:1 43:1
252:5	192:1 242:7	125:15	216:10	47:20 69:9
Hill 177:1,	hours 23:10	127:10	imperative	76:13
7 178:20	30:16	128:8	291:14	77:20
history	104:8	142:17	importance	143:8
54:21 55:1	112:10, 14	167:11	249:8	210:23
101:11	113:4	193:1	important	211:13
143:10	114:18	206:23	32:24	212:11
154:2	229:1, 7	215:7	157:9	213:10
162:20	273:3	221:6	177:6	inclusion
225:14	HT 153:16	236:17, 24	185:24	15:13
histotypes	Huh 83:21	251:14	231:23	196:19
173:2, 13	84:8	266:24	234:17, 18	inconsistent
174:4, 16, 20	Huh's 81:3	267:10	inaccurate	211:21
175:1, 7, 15,	human 6:2	268:7, 17	37:14, 23	212:11
23 176:4, 11,	216:14, 15	269:3, 14	inappropriat	incorrect
18 184:8, 11,	219:14	270:1, 12	e 244:4	122:1
13, 17 185:3,	227:13	280:18	incapable	increase
			243:23, 24	135:24

142:1	indication	232:2	198:4, 14	interpretatio
157:12	132:14	275:16, 20	199:21	n 265:19
168:8	164:4	276:9	intake	interrupt
169:16	indications	277:22	54:18, 20	55:19
175:5	284:22	282:12	intend 22:5	95:13
176:8	individual	informed	26:14	176:21
262:4, 16	275:14	276:15	30:17	223:23
increased	individually	inhalation	34:16	227:24
141:9	171:19	208:7, 13	68:12, 22	interval
149:21	173:18	inhibiting	70:20 77:4	158:12, 17
152:9	174:10, 12	219:19	78:1 86:10,	171:8
156:8	176:23	initial 122:2	23 130:11	172:2
169:13	induce	273:7	258:15	174:6
183:14	225:22	initially	265:8	175:3 203:4
204:16	induces 6:1	143:17	intended	intervals
205:4	228:5	inquiry	57:22	158:14
217:13	236:13	241:22	interacted	160:7, 10
228:11, 14	253:3	243:13	52:5 271:14	260:16
254:23	inert 218:4	insisting	interaction	introduction
255:1		244:20	154:9, 10	143:3
265:17	inflammation	insoluble	155:13, 18	invade
increases	141:13, 19	5:21 221:3	156:3, 15	223:20
142:4	157:4, 5, 6	instance	256:13, 21	inverse
208:21	284:23	175:17	interactions	187:13
209:5	inflammator	instances	153:7, 22	investigated
increasing	y 141:7, 11,	243:11	interest	228:22
262:5, 17	24 157:12	Institutes	161:16	229:2
independent	inflation	162:5	162:23	230:15
220:14	106:9	institution	189:13	investigation
INDEX 8:2	influence	162:4	191:10	60:5
143:8	191:21	instruct	195:24	Invitae
153:15	inform	239:14	220:13, 18	102:13
Indiana	76:18	243:7	231:13	invoice
40:2	informal	INSTRUCTI	281:10	106:3
Indianapolis	118:8	ONS 291:1	283:1	107:11
40:3, 10	information	insufficient	287:5, 9	108:24
indicate	51:20	252:23	interested	109:5
254:14	168:14	253:6	67:14	110:4, 21
indicated	175:14	insurance	138:10	111:3, 20
16:15	176:17	101:16, 18	232:23	112:13, 16,
107:24	185:13	102:2	290:16	17, 18, 24
132:7	205:18	103:22	interpret	113:1
Indicating	213:7	intact	185:19, 20	114:13
214:13	231:24	197:10		

invoiced	issues 45:21	26:2 69:24	103:13	25:3 35:20
105:19	87:24 88:5,	70:7, 12	127:2, 8, 16	46:8 48:10
112:20	10 129:3	243:14	129:1	54:19 56:6
113:5	item 36:12	275:8, 9	130:5, 18, 22	68:12, 21
114:10	its 57:23	281:23, 24	131:4, 11	69:17, 21
Invoices	146:1	Johnson's	132:20	71:18
3:21, 24	248:22	23:5	133:3	72:19
105:23	IV 95:11, 15	journal	220:9	76:22
106:12		88:21	267:3, 7	77:24
107:2, 13, 17	< J >	163:7, 20	Julie 83:20	79:18
108:7, 10, 13,	J774 5:22	189:18, 20	84:5	81:19
16, 19	221:4	249:2, 17	July 18:19	84:16
109:18, 21	January	journals	jump	92:16, 21
110:8, 16	1:13 3:22	230:16, 20	111:18, 22	95:12, 20
111:1, 7, 10,	30:5, 11	232:16	June 38:23	97:22 98:6
23 113:18	38:23	Judge 10:8,	97:8 117:6	99:16, 18
114:2, 11	39:11	12 21:21		100:1
involve	49:18	22:17 43:12	< K >	103:8, 10, 11
66:20	57:20	JUDITH	Kansas 2:19	108:12, 20
273:24	58:24 59:3,	1:18 3:5,	KAY 1:18	109:14
involved	7, 9, 11	16, 21, 23	3:5 25:10,	115:1, 19
42:19	107:3	4:3, 5, 9, 12,	21 293:16	119:23
46:21, 23	114:15	15, 18 25:10,	keyword	126:10
58:14	117:2, 24	21 71:9	67:20	129:14
61:24	122:11	107:2	Ki67	130:10
189:17	290:21	110:15	227:22	138:11
208:6 216:6	JERSEY	116:3	228:11	148:22
involvement	1:1, 6	119:18	Kim 241:1	154:16, 21
191:11	10:11	124:21	273:1 289:7	156:13
195:17	12:21 14:9	125:14	Kimberly	159:5
involving	15:20, 22	127:9	1:20 290:5,	162:8, 11, 17
47:10	JJG 220:14	128:7	19	165:24
63:14	Johns 81:4	293:16	kind 104:8	168:20
64:17	83:21	Judkins	238:10	176:17
65:19	JOHNSON	4:14 6:15	256:13	179:13, 14
112:6 216:7	1:1, 4 2:20,	28:17 31:4	kit 228:23	182:14
issue 12:9	21 10:1, 16,	85:11, 18, 21	kitchen	188:11, 14,
15:24	17 13:22	86:2, 12	27:14	16 190:5, 15,
21:22	14:4, 5, 16	87:12, 24	Kleiner	18 208:23
24:13	15:12	89:23 90:5	193:24	216:17
56:17 244:2	17:15 18:5,	96:6, 10, 13	194:6, 14	217:3
issued	16 19:11	97:1, 14, 19	195:1	219:24
22:18 276:1	20:15 23:5,	98:16 99:3,	know 13:10,	220:1
	22 25:23, 24	21 100:3	18 18:11	226:15, 17

228:17	lawyer	135:1, 6, 22	151:4	listed 40:18
229:9, 17	243:14	208:20, 24	168:18	41:22
231:24	272:5	209:4, 21	limited 12:4	68:14, 24
233:2	lawyers	levels	14:18	69:6 75:7
235:14	231:20	209:13	20:24	82:19 84:8
238:8	272:5	Levy 19:24	148:3	85:5
242:8, 11	LAWYER'S	33:4, 12, 13	171:1	listing 57:24
244:13, 19	294:1	63:20	208:2	lists 60:3
245:3, 7	lead 223:16	69:15	212:6	116:16
247:22	224:2	269:18	234:13, 15	173:6
250:23, 24	leave 18:12	Levy's 7:4	241:5	184:20
254:9	22:5	17:13 19:9	limiting	Literature
259:20	leaving	29:14, 20	22:2 92:5	7:8 16:4, 8
271:2	273:8	32:15	99:11, 23	26:15 27:4
286:17	lecture 45:9	269:23	limits 23:9	28:4, 5, 24
knowledge	lectures	276:4	Linda 125:8	29:7 32:21
20:14 88:22	45:5 50:6	LIABILITY	Line 8:6, 9,	53:5 65:22
	left 28:2	1:5 26:4	13 144:4	66:16, 20, 22
< L >	35:2 43:24	license	237:12	67:2, 10, 21
L.L.P 2:16	192:8	272:10	292:3 294:2	68:5 72:15
labeled	left-hand	lied 279:16	lines 93:4,	74:11
279:18	180:22	life 95:19,	14 161:21	76:14
lack 160:5	LEGAL	21 96:1	218:3	104:6, 19, 20
lacking	2:13 9:22	98:16, 18, 20	List 3:14	265:16
137:4	10:4	lifestyle	16:2, 5, 18	270:5, 10
	LEIGH 2:3	154:3	20:6 29:3,	LITIGATION
Laparoscopic	9:12 16:22	182:18	9 33:18	N 1:6, 12
42:14	23:19	lifetime	34:17, 20	10:7 11:1,
	27:21	179:7	35:4 37:2	2, 18, 19
laparotomies	78:22	likelihood	44:3 71:1,	14:9 15:21
42:16	82:18	94:2	6 72:1, 7, 12,	26:4 47:5,
late 30:6	105:9	likewise	16, 18 73:16,	7 52:22
98:13	121:8	125:23	18 74:9, 10,	57:1 61:2,
latest 26:23	233:24	limit 89:1	11 79:5, 16	19 63:14
LAW 1:9	238:8	233:12	80:8 81:16,	70:14
47:20	271:24	274:14	18 82:10, 15	108:11
162:2, 3, 9,	leigh.odell@	limitation	83:17 84:9,	112:5
12, 14	beasleyallen.	146:9	17 104:10	189:17
163:12, 24	com 2:6	148:14, 17	119:1	220:16
189:7	letter 57:22	150:22, 23	122:14	230:24
190:4, 9, 18	letting	151:12	213:17	233:7
195:21	235:18	limitations	239:2	238:23
	level 132:20	73:24	241:12, 14,	243:11
	134:10, 18	98:23	19	264:22

272:6	62:17	200:11	106:22	251:20
281:18	63:19	201:14	108:5	256:7
282:13, 23	69:14	214:7	112:17	261:5, 13
283:5	80:24	218:1	117:9	262:2, 7, 9
287:23	275:13, 24	219:7	118:24	278:5
little 31:21	Longo's	231:11	120:16	281:22
74:5	6:24 7:3	234:5, 22	124:5	looks
112:12	17:8 19:5,	238:5	128:14, 18	161:18
115:3	7, 24 32:14	242:10	141:6	186:5
136:7	33:14 34:2	244:24	142:24	227:19
179:18	35:3 36:9	245:14	143:2	losing
209:3	65:13	246:7, 18	144:12	163:18
216:5	210:14	248:2	145:14, 18	lot 52:9
218:7	268:21	249:23	151:15	66:12 76:6
236:5	269:1, 7, 11	256:10	154:12	138:4
237:20	270:22	259:21	155:7	240:3
live 138:21	long-time	278:11	164:24	252:5 284:1
location	160:23	279:18	166:24	lots 179:9
1:18	look 31:21	looked 83:5	168:19	216:21
locations	34:5, 8, 11	110:3	171:10	love 283:11
138:12, 14	35:18 36:2,	111:2	174:8, 20, 23	low 171:14
Locum	12 54:20, 23	171:20	180:16, 17	lower
137:12	64:3 75:22,	173:1, 7	182:5, 9	101:10
locums	24 83:11	174:11	183:8	186:20
38:11	91:17	178:2, 5	185:2, 7	low-grade
137:9, 11	113:12	197:4	186:8	173:8 185:8
lodged	118:19	198:3	188:23	lung 131:5
121:16	140:9	208:7	194:11, 23	132:7
log 114:20	141:5	211:3	196:8	Lynch 3:18
long 30:3	152:14	217:13	197:14, 16,	78:11, 15
84:17	157:15	221:20	24 203:20	79:3 80:4,
94:20	161:4	224:20	204:13, 24	12, 19
98:12	169:22	227:12	207:20	
179:10	171:18	229:8	214:9	< M >
234:6 244:1	173:18, 23	230:7	215:22	M.D 1:18
longer	174:1	285:20	218:2, 13, 21	3:5, 16 4:3,
13:13	175:22	286:22	221:15, 17	6, 9, 12, 15,
94:12	177:22	288:11	222:9	18 25:10
115:3	182:24	looking	223:5	71:9 116:4
186:20	183:22	28:3 64:7,	225:24	119:18
Longo	184:1	9 74:2, 10	228:19	124:21
29:12, 13, 19	188:4	76:4 80:11	230:3	125:14
33:4, 12	190:23	81:5 82:5	231:15	127:9
61:19	198:8	85:6	250:12	

128:7	Mandatory	119:13	167:10	20:6, 9, 16
293:16	5:13 206:21	120:2	192:24	21:1, 3
macrophage	manner	121:3	197:16	22:24
221:19	178:1	122:20	206:23	23:12, 15
224:24	manuscript	123:7	215:7	24:5 26:15
225:17	248:4	125:5, 8	221:5	27:5, 22, 24
		126:3, 21	236:17, 24	29:3, 6, 8
macrophages	manuscript's	127:24	242:24	32:2 33:18
5:22	248:9	143:20	251:14	34:16, 20
214:10	March 97:7	152:20	266:24	35:4, 11
215:23	MARGARE	154:16	267:9, 15	36:19, 23
216:1, 13, 15,	T 2:4 9:15	170:9	268:6, 16	37:2 53:6
19, 23	27:15, 16, 21	184:5	269:3, 13, 24	68:19 71:1,
217:15	84:4 105:9	197:15	270:12	6 72:1, 7, 17
218:24	271:24	212:1	271:4	73:16
219:3, 13, 15	272:11	214:23	273:13	78:10 80:4,
221:4	margaret.tho	233:8, 9	275:12	9 81:8, 15,
224:23	mpson@beas	234:5, 20	277:3	18 82:9, 14
main 203:7	leyallen.com	235:7	279:5	84:3, 9, 18
major	2:6	237:14	280:17	239:2
237:8, 10	Margaret's	238:16	marker	241:11, 14
246:17	84:12	241:4	228:12	266:11
majority	MARK	244:23	markers	267:19
101:6	2:18 9:24	247:10	227:21	270:17
248:24	10:15	251:7	Market 2:14	273:20
making	25:22	258:4	MARKETIN	matter
75:1 242:2	35:13 43:8	267:13, 17	G 1:4 26:3	56:15
malignancy	62:8 65:1	270:20	marking	matters
224:3	70:22	279:4	124:13	73:5
malignant	72:22	280:1, 3	MAS)(RES	MCL 1:13
6:1 43:3	73:21	Marked	1:4	11:23 12:3
228:5, 24	76:23	8:13 71:10	mass 143:8	15:2, 6
229:6	78:19	80:6 107:3	153:15	McTiernan
236:14	81:12	110:3, 17	masses 43:4	61:18
250:4, 8, 9	84:10	116:4	Master	62:16 81:1
253:5, 15	89:21 93:6	119:19	18:17	285:24
Mandarino	102:19	124:21	material	286:11
5:19 105:2	106:21	125:15	69:16	McTiernan's
213:17	107:10	127:10	276:14	288:10
214:2, 12, 15,	108:3	128:8	Materials	MDL 1:1
20, 22 215:6,	110:9	129:4, 19	3:12, 18	4:6 7:3
17 224:19	114:23	130:13	16:2, 10, 17	9:19 12:1,
284:7	115:23	136:17	17:3, 4, 16,	22 14:7, 19
	116:20	142:16	21 19:14, 16	17:10, 11

26:6, 17, 23	234:2, 3	medical-	142:20	mice 215:20
28:13 34:3	254:9	legal 122:9,	160:2	216:10
37:8, 20	258:12	15	172:24	219:6, 9, 13
49:18	265:13	medication	173:19	MICHELLE
50:21 51:4,	means	182:18	229:19	2:9 9:17
15 57:2, 8,	154:14	medications	237:3 264:6	24:16, 24
13 58:12	155:16	44:14	Merit 1:20	105:10
61:1 63:13,	172:2	medicine	290:5, 20	162:14
24 105:17	183:17	118:22	met 41:16	middle
106:6	222:8	180:2	104:7	122:1
108:11	232:13	meet 18:9	105:6	midway
110:22	254:7	105:7	193:18	206:2
111:4, 8	meant 99:4	193:20, 22	220:2	migrate
112:5	measure	meet-and-	272:11	223:19
119:19	182:8	confer 10:22	Meta-	milligrams
120:17	188:3	meet-and-	analysis 5:8	179:15, 16
127:24	217:9, 12	confers	165:17, 18	mind 64:24
129:22	218:17	10:14	192:23	82:21
166:12	223:7	meeting	205:22	120:3
188:18, 21	measured	48:22 59:4	285:20	123:16
220:4	218:12	105:13	288:10	134:12
230:24	223:1	271:13	metal	170:9
232:15	measures	meetings	131:13	203:15
269:11	200:2	48:15	132:16	mine 45:8
271:3, 16	mechanism	member	metals	135:18
272:6	214:8	10:5	50:17	minimal
Meadow	247:1, 3, 5	members	135:23	248:3
10:10	Medical	59:15, 17	methodology	minimum
mean 29:1	39:23 40:8	197:6	87:23 88:4,	201:12
44:13	41:11	mention	9, 14, 19	Minneapolis
82:24	44:14, 21	156:1	89:4 136:23	40:12
84:10	48:8 59:12,	168:23	methods	Minnesota
97:23 99:2	21 60:10	273:21	140:16	40:12
104:23	66:15, 19, 21	mentioned	200:5 201:1	minute 34:9
108:20, 22	67:2, 9, 21	23:6 28:23	methyl	75:22
113:17	68:4, 9, 18	31:15 37:7	222:18	96:11
121:9	85:11 86:3,	48:18 51:8	methylating	139:23
132:22	9, 21 104:19	63:10, 17	222:2, 3	206:9
149:16, 17	106:17	65:12	methylation	minutes
150:3	117:11	69:10, 14	221:24	25:2, 3
157:22	131:9, 15	105:5	222:19	35:21 63:1
210:17	272:10	111:10	mhegarty@s	115:1
222:4, 13		138:12	hb.com 2:20	234:8
232:3, 11		139:2		244:22

245:21		mutations	need 22:20	74:12
274:18	Montgomery	76:13	34:4 38:12	75:19
285:11, 13	2:5	103:14	41:7 75:21	77:14
misogyny	month	222:14	91:16	104:24
48:9	38:13, 24	254:14, 18	93:18	118:4, 11
missed 65:2	42:10, 13	Mutch 91:6,	129:14	130:15, 23
120:4	monthly	23 92:23	131:23	131:1
Missouri	42:7	Mutch's	137:18	132:3
2:19	Moorman	91:11 93:7	230:12	135:12
misstates	188:14	Myriad	239:4	140:22, 23
194:16, 17	189:6	102:9, 16	242:22	211:13, 14
195:4	190:9, 16		250:15	216:9
257:4	191:1	< N >	276:10	286:6, 8
263:2	281:15, 16	name 25:20,	needed	NHS1
282:16	286:23	22 41:12, 14,	37:14	258:2 260:8
mixed 185:9	morning	18 45:7, 17	138:16, 18	nice 115:7
model	12:8, 16	72:18	200:7	Nicollet
65:24 66:11	18:8 19:22	116:9	272:8	40:11
models	21:5 24:6	121:24	274:2	nights 10:22
230:1, 9	25:17, 18	225:19	275:17	NIH 67:6
molecular	mouse	named 79:1	needs 234:8	164:2
247:3	215:18	104:20	244:7, 8, 12,	NJSC 12:21
moment	216:7, 12	names	13 245:2, 14	nongenital
35:14	218:24	40:24	258:6	157:18, 23
83:23	221:21	51:10	negative	158:18
110:3	move 35:6	105:3	204:11	160:3
116:20	mucinous	137:14	Neither	non-ovarian
123:6	171:16	National	20:13	52:16
126:5	172:18	58:18	290:14, 15	nonstatistical
129:4	173:9, 20	59:13 162:5	neoplastic	ly 201:24
145:24	185:9	naturally	250:14	202:10
212:1	multicounty	216:4	neutral	204:10
280:9	11:2, 18	nature 9:6	228:19	non-talc
288:22	14:8	NCI 264:1,	never 49:24	170:18
Monday	multidistrict	9, 14, 23	220:1	normal 6:2
107:19	10:7 11:1,	265:4, 12	233:3 261:9	92:2 228:6
108:1	19	NCI's 53:21,	nevertheless	236:14
money	multiple	24	282:19	255:1
195:21	38:11 79:7	nearly	NEW 1:1, 6	Notary 1:21
Montana	mutated	17:23 23:6	10:11	290:6, 21
39:1, 8	254:24	necessary	12:21 14:8	293:23
40:15	mutation	229:12	15:20, 21	note 14:24
117:17	77:15	291:4	26:8, 24	15:1 18:17
	222:9, 21		28:5 65:22	121:23

198:9	124:8, 16	251:22	134:4, 21	152:6
273:17	126:1	252:17	135:9	153:9
277:21	127:15	numbers	136:2	156:17
notebook	128:20	143:18	140:6	158:2
64:3, 9	136:9	154:24	144:24	159:14
116:21	178:16	158:5	147:14	169:4
123:11	264:4 269:7	169:21	148:5	170:19
noted 18:19	Nowak 5:15	172:11	149:14	175:9
291:11	135:14	173:19	155:19	176:13
293:11	205:21, 23	174:12, 21	158:20	182:11
notes 36:22	206:7, 12, 22	175:15	163:1, 14	191:15
119:7, 8	209:15	176:22	165:2, 20	194:15
294:1	212:12	185:4	172:5	195:3
Notice 4:3	null 155:17	198:1	175:10	196:5
19:20 21:4,	170:5, 16	251:6	177:9	197:11
9 23:3	172:1	259:21, 22	178:24	198:21
24:4, 6	number	260:3, 4, 5, 7,	180:11	200:17
117:4	10:13, 19	10, 18	181:12	202:17
119:14, 17,	18:18	263:16	199:14	207:16
24 120:16,	22:17	Nurses	204:4	208:9
21 121:14	76:11	196:22	217:1	209:18
noticed	77:18	197:2	222:15	210:9
14:20	80:23	198:24	224:8	212:13
121:24	82:16, 19	199:1, 17	229:15	224:21
notices 19:3	83:11	258:24	231:6	257:14
Notification	84:13, 15	259:4	232:8	259:9, 18
5:14 206:21	114:17, 21	263:20	237:12	263:1
noting	120:3	265:21	248:19	276:18
141:12	121:16	NW 2:9	253:11	282:4, 15
novel	122:8		256:18	285:1
254:18	149:11	< O >	257:3	objections
November	150:13	O2 218:19	261:3	121:6, 16, 20
16:11 17:7,	157:16	object	264:16	O'Brien
11 19:6, 8,	165:16	15:11, 13, 19	266:6	165:6, 11
10 28:12	171:11	20:22 22:1	287:12	196:3, 14, 16,
29:19, 20	172:9	32:5 53:14	288:4	18 198:18,
30:6 31:22	175:19, 24	61:21 65:9	Objection	23 199:3, 5,
32:14	179:7	69:3 76:20	33:20 57:3	9, 11, 18
63:21 69:1	183:19	81:23 93:6	59:24 62:9	observed
71:2 72:2,	204:8	97:3 98:2	81:13 89:8	211:19
8 97:2	216:18	99:14	91:14	obstacle
113:21, 22	246:8, 18	103:16	104:13	238:12
115:16	247:14, 15	107:12	150:20	obstetrics
122:22	248:2	133:7	151:20	44:22

obviously	17:1 19:5	133:7	17 204:4	278:23
24:9 242:17	21:14	134:4, 12, 21	206:1	279:4, 11, 23
OCAC	22:15	135:9	207:16	280:20, 23
140:11	24:12	136:2	208:9	281:3
141:2 156:7	27:21 32:5	140:6	209:17	282:9, 18
occasionally	33:20 34:4	143:16	210:9	283:6
42:18	35:13 36:7	144:24	211:24	285:3, 10, 14
66:10 67:12	43:8 53:14	147:14	212:13	287:12
	57:3 59:24	148:5	213:21	288:4, 24
Occupational	61:21 62:6,	149:14	217:1	O'Dell's
5:12	18 64:6, 24	150:20	222:15	16:15
206:20	65:9 69:3	151:20	224:8, 21	offer 70:20
207:11, 14	72:21 73:4,	152:6, 19	225:10	77:4 265:8
208:3, 20, 24	12, 21 74:4	153:9	229:15	offered
209:4, 24	75:21	154:15, 20	231:6	101:24
210:4	76:20	155:19	232:8	247:24
occurred	78:19, 23	156:17	233:8, 16	offers
43:17	81:12	158:2, 9, 20	234:1	102:17
240:22	82:11, 20	159:14	235:7, 11, 16,	offhand
245:24	83:4, 10, 15,	163:1, 14	19 237:11	114:22
272:22	22 84:10, 15	165:2, 20	238:16	165:24
289:5	86:16 87:1	169:4	239:10, 15	officer
October	89:8 90:3,	170:8, 19	240:24	82:13
110:1, 10	15 91:14	171:3	242:8	oh 84:5
112:19	93:5, 15	172:5	243:9	97:6
113:20	97:3 98:2	175:9	244:10, 23	198:10
117:7 264:1	99:2, 14	176:13	245:20	206:3
odds 150:9	102:18	177:9	247:10, 15	216:17
155:3, 9	103:16	178:24	248:19	235:14
157:17	104:13	180:11	253:11	258:20
171:6	105:9	181:12	256:18	Okay 32:12
173:16	107:10	182:11	257:3, 14	36:15
174:5, 17	108:12	184:4, 9	258:4, 10	73:12
175:2	109:11	191:15	259:9, 18	79:13
185:14	111:4, 9	192:3	261:3	83:13
186:8, 13	113:10	194:15	263:1	89:24
187:7	114:23	195:3	264:16	90:17 96:8
203:3, 21	116:19	196:5, 10	266:6	106:16
205:5	120:2, 7	197:11, 15,	267:12, 21	113:14
209:6	121:3, 15	19 198:21	270:20	115:8
256:14	123:6, 16	199:14	271:24	121:21
O'DELL	125:4	200:17	274:10, 24	122:5
2:3 3:6	126:3, 12, 17	202:17	275:5	123:19
9:12 16:14	131:22	203:6, 11, 14,	276:20	126:12

140:1	48:10	266:3	265:7, 10	ovarian
144:3	137:5, 8	275:21	275:17	4:20 5:1, 2,
154:18	140:14	276:9, 11, 12	288:2	7, 11, 18 6:2
166:5	251:5, 10	284:9	opportunity	7:11, 12
167:13	ones 108:8,	opinions	24:3 35:18,	42:24 43:4
171:4	9 109:1	19:1 20:12	24 36:2	44:6, 11, 18
189:2	165:24	26:7 27:1,	81:21	45:2, 21
192:3, 4	265:14	5 30:19, 21,	233:18	46:1, 6, 13
202:8	online	22 31:2, 3, 9,	239:24	47:10, 19
203:7	66:21, 24	13, 14 46:12	240:9 241:8	49:7 51:2,
206:3	67:8	50:21	opposed	6 52:4, 8, 10,
213:15	open 18:4	51:14 57:1,	263:19	14 53:13
214:19	22:6 273:8	8, 13, 17	Oral 1:13	54:4, 9, 12
235:16	operating	58:10 59:5	4:3 119:17	55:4, 14
247:17	45:1	68:13, 23	oranges	56:5, 6, 10,
255:4	operation	69:19	260:20, 24	12, 16 57:18,
259:6	42:18	70:19	order 18:18	24 58:11, 18
266:15	opinion	76:19, 23	22:18, 22	59:5, 13, 23
267:21	18:18	77:3 78:2	23:9 82:4	60:2, 12, 13,
274:20	30:21	86:12, 24	274:13	20 61:3, 15,
279:4, 13, 21	31:17, 18	87:10, 14, 18	276:15	20 63:15
280:22	32:23 51:1	88:15 89:6	289:12	64:18
Oklahoma	53:10	95:18	ordered	65:24 66:7,
45:6, 13, 16	75:13 82:3	98:15, 20, 22	18:20	10, 12 67:24
old 81:24	83:12	99:10, 20	organization	77:16 91:1
89:14	92:13, 17, 20	102:15	48:6, 15	92:15, 19, 22
90:21, 23	94:1 97:18,	118:13	59:21 60:11	94:4, 14
96:10	21, 24 98:5	123:15	original	95:7 97:15,
older 76:7	102:24	130:8	95:1 291:15	20 99:22
once 61:8	140:15	140:22, 23	originally	100:15
182:7	144:20	159:10	14:20	101:7, 21
183:6, 7, 10,	145:3	160:12, 15	outlined	102:4
13, 23	148:19	166:18	250:19	112:6
184:14, 21,	188:4	168:3	outrageous	130:10, 22
22 185:18	189:12	194:3	248:8, 18	131:21
187:1	191:9	205:12	outside	134:11, 19
261:9, 21	205:17	207:6	46:9 47:4	135:8, 16
oncologist	208:19	210:6	56:24	136:1
41:7, 12, 24	209:4	213:4	138:21	141:4, 9, 13,
91:5 96:22	211:16	219:1	189:8	19 142:4, 14,
oncologists	226:8	220:8	191:20	22 143:7
94:22 266:1	251:2	221:13	272:12	144:8
Oncology	253:19	227:8	outstanding	145:6
6:9 45:10	257:11, 17	249:13	35:2	152:9

154:3	281:19	136:21	panel	215:6
156:9	284:18	139:8	100:14, 16,	220:22
157:1, 5, 7,	ovaries	143:3, 13, 18,	22 101:21	221:5, 9, 12,
24 160:16	230:4	19 160:20	102:8, 12, 16	15 222:24
167:7, 8, 19,	ovary	161:5	103:4	224:20
24 168:4, 15	167:22	164:12	Paper 4:22	225:4, 19
169:14	248:6	166:4	5:3, 9, 15, 19,	226:24
170:1	overall	180:17	22 6:3	227:10
173:2, 10	198:19	189:1	7:14 49:21	228:1, 4, 9,
175:6	overinterpret	204:14	67:13	11 229:13
176:9	ed 253:8	205:19, 23	140:2, 10, 12	230:16, 20
177:23	overlooked	206:1	141:5	231:3, 10
179:4	36:9	213:14, 20,	142:8, 15, 22	232:7, 17, 19
186:21	oxidative	21, 22, 24	143:1	233:1, 3
192:21	219:19	220:12	146:1	234:12
204:16	oxide 218:5	246:17	149:12	236:16
206:19	226:5	251:22	150:1	237:5
207:8	oxygen	252:17	151:4, 6, 7, 8,	248:14
208:21	217:14	255:9	10 152:2, 23	249:12, 16
209:6	218:2, 12, 18	262:15	156:7	250:11
210:8, 13, 18,	284:21	277:4, 6, 8	159:10	251:2, 17
21 211:4, 20		278:19, 23	160:17	255:14, 17,
212:10	< P >	279:14, 15	162:24	20 256:5, 7
213:8	p.m 115:11	281:9	166:19	257:12, 23
215:5, 20, 23	192:6	283:14, 15,	167:9	259:8, 13, 23,
216:4, 11	246:3	16 285:20	168:2, 7, 24	24 260:2, 6,
219:2	274:23	292:3 294:2	171:11	9, 13 261:1
221:16	289:15	Pages 3:19,	175:5	263:18
224:7	p53 227:21	23 106:21	176:18	272:16
225:1, 17	228:14	107:1	182:4	278:6, 18
226:9, 11	254:13, 16,	110:15	188:1, 14	280:7, 16
227:14, 17	23 255:1	113:19	189:24	281:5, 21, 22
228:7, 15	PAGE 3:12	124:1	191:2, 8, 12,	282:2, 13, 22
229:20	8:6, 9, 13	143:14	23 192:23	286:5, 22, 23
230:2, 5, 10	72:4 80:11,	244:18	195:19	287:2
236:15	22 85:5	245:5 293:6	199:6, 9, 17,	paperclip
248:7	110:7	paging	19 200:2	237:20
252:7	116:16	180:18	206:7, 12, 14,	papers
253:4	117:19	paid 105:22	22 208:16	104:24
262:5, 16	120:10	114:9	209:15	166:9
264:23	124:5	230:23	210:3, 12, 20	200:20
265:5, 18	125:24	231:4, 16, 17,	211:3, 6, 8,	214:15
266:4	127:14, 19	20 283:3	10, 15, 17, 18	225:15, 16
280:14, 15	128:13, 14	287:15, 21	212:2, 9	229:10

248:23	126:24	150:17	19 171:12	peer-
249:4, 19	129:2	172:20	173:7	reviewed
286:6, 8	145:19	pathologicall	175:18	249:16
paragraph	164:11	y 149:2	197:5	peers 50:6,
72:5 73:19	176:24	pathology	199:8	23
136:22	194:24	148:11	263:17	pejorative
137:1	248:16	pathway	276:6	234:14
139:9, 13	257:23	173:21	patient's	penetrance
152:15, 18,	258:23	patient	46:9 55:1	101:8
23 153:1, 5	259:4	51:24 52:4,	102:2	
164:17, 23	262:10, 15	5, 17 54:3, 8,	Patricia	Pennsylvania
200:12	participants	17, 20, 21	188:14	2:15 39:23
205:20	170:21, 23	55:22	281:15, 16	40:9
212:19		94:13 98:8	pause 9:7	people
213:16, 24	participation	100:19	64:5 71:16	146:22
214:5	191:14	101:1, 2	90:8 96:12	179:9
226:20	particle	141:22	116:22	260:21
249:23	226:13	145:4	136:12	percent
250:1	particles	147:9 149:5	139:24	44:8 46:2
283:15, 17,	5:22 221:4	patients	145:15	93:2 94:2
18, 19 284:6	223:2	44:6, 12	165:1, 4, 9	168:7
paragraphs	225:22, 23	45:3, 23	166:22	204:1, 18
73:19	particular	46:1, 4, 20	205:2	205:7
74:11	26:5 32:1	51:15, 19, 20	206:10	percentage
119:1	41:8 53:19	52:6, 8, 10,	226:2	44:4 45:19
121:2	72:13	13, 14, 20	227:3	98:9 150:7
161:10, 17	101:21	53:1, 20, 24	231:8	168:7
166:7	102:24	54:13 55:4	255:21	216:23
180:23	120:19	56:2, 9, 16,	261:15	perfectly
PARFITT	173:6	18 77:7, 8	pay 101:16	238:17
2:9 9:17,	276:5, 23	94:6, 15, 23	103:22	239:6
18 24:15, 17	particularly	95:6, 10, 14	payment	perform
25:5	41:20 168:3	98:11	161:6 162:1	42:2, 7, 12
105:10	parties 9:3,	100:15	payments	performed
162:14	9 290:15	101:7, 14, 22	164:5	194:11, 23
Park 40:11	part-time	103:20	pays 138:23	Perineal
part 15:7	38:10	106:18	PDF 237:17	5:6 192:20
44:23	patent	123:2	PDQ 53:21,	204:17
54:22, 24	197:23	147:2, 6, 20	24 264:1, 10,	perineally
61:10	199:13	149:10, 24	14, 19, 23	210:7
78:11	201:19, 22	150:7, 13	265:5, 12	period 24:1
105:10	202:6, 7	155:2	peer 232:5,	39:2
106:18	pathologic	157:24	18 248:17	
119:8	146:16, 19	159:12, 16,		

person 105:8 242:14, 15	physiologic 254:18	230:23 231:4, 21	PLOS 6:5 236:20 246:15	possess 250:18
personal 189:7	picked 111:23	266:2 271:15	P-L-O-S 246:15	possession 17:22 23:5 81:9, 11
Personally 250:8, 23	piece 205:17 213:6	272:6 274:6 275:14, 15	plot 277:8, 17 278:16, 18 279:1	possible 60:4
pertain 20:10	232:1 272:15	283:4 287:22 288:15	plus 185:10	potential 214:8 221:15 229:12
pertains 128:20 207:10	Pier 83:21, 24 84:5	plan 49:20	point 13:11 32:20 62:5 82:15	POWDER 1:4, 11 4:22 5:7, 24 7:10 26:2 37:17 47:10 49:2, 11 50:8 51:21 52:1, 21 53:12, 22 54:5, 10, 18 55:2, 23 56:3, 11, 18, 19 61:3, 14, 20 63:15 64:1, 18, 22 65:7, 19 68:1 110:22 112:6 114:3, 19 130:9 132:21 133:6 143:9 156:4, 15 157:1, 3 160:24 164:6 167:6, 19 168:9 169:15 170:2 176:10
pertinent 75:12	pigs 66:9 229:21	plans 32:17 38:17, 18, 21 39:6 49:14 50:1 58:6	point 13:11 32:20 62:5 82:15 83:20 156:20, 21 161:7 242:2 254:16 258:8	
ph 1:23	place 14:14 131:24	please 9:7, 10 25:19 71:17 79:18 82:17, 18, 23 115:18 119:22 134:13 136:10, 21 139:8 143:24 152:14 153:23 157:15 164:9 166:3 189:3 196:10 205:19 213:13 214:13 220:21 223:23 226:19 241:22 247:5 283:13 291:3, 8	pointed 41:20 pointing 284:15 points 101:12 pooled 164:19, 22 165:7 portion 231:18 241:5 245:9 278:24 Porto 10:12 position 12:19 13:10 16:23 18:1, 7 243:2 274:7, 12 positions 137:18 positive 204:11	
phagocytes 5:17 215:4	203:18 272:12 290:11			
phenotype 250:18	places 38:12 41:5, 19			
phenotypic 253:24	Plaintiffs 2:7, 11, 16 9:14, 19, 23 10:5 14:4 17:2, 9, 10 18:20 20:11 24:2 28:15, 16 31:14, 18 33:3, 8 52:21 56:24 78:8 89:5 105:6, 20 106:5 127:23 133:21 134:2 160:23 162:21 188:18 189:15 193:15 220:4			
Philadelphia 2:15				
phone 61:6 62:24 112:10 114:21				
phrase 15:11				
Phung 4:22 77:21 105:2 139:15, 17, 21 140:2, 5 142:16 144:13, 21 156:2				
physical 28:20 29:2				
physician 41:8 50:8, 22 272:9				
physicians 41:1 147:21				

179:4, 17	preinvasive	presentation	principle	produce
180:1	43:5	48:20	11:6	18:21 22:24
181:2, 3	preparation		Prior 33:10	produced
190:11, 17,	129:18, 20	presentations	37:5, 10	69:23 70:6
20 192:21	130:2	50:5, 15	74:10 92:5	72:12
193:15	191:12	presented	98:24	84:19
195:18	271:12	48:21	99:10, 21	113:8
199:21	prepare	presume	101:3	121:10, 12
200:14	73:15	161:24	107:13	232:5
204:17	104:3, 12, 21	presumed	108:7	238:22
208:17	105:13	148:3	111:10	product
209:13, 23	285:21	pretty 83:7	130:4	62:1 247:4
210:7, 16	prepared	84:11	139:14	Production
214:7, 11	16:12	159:1	144:13	8:8 217:14
216:23, 24	17:17	225:16	166:12	PRODUCTS
219:2, 8, 17	20:18 21:7,	Prevention	290:7	1:4, 5, 11
221:16	10, 11 26:22	189:19	privilege	5:7 26:3, 4
228:5	27:3 34:19	previous	62:2	192:21
236:13	36:22	33:14, 15	privy 249:6,	213:10, 11
247:1	47:18	63:10	18	professional
248:6	78:24	100:16	Probably	23:2 46:24
252:10	114:13	129:22	30:16	48:15
253:3	119:7	164:20	40:19, 23	program
266:2, 4	215:15	196:21	42:9 44:7	44:22 45:6,
280:13	234:23	210:15	68:7 95:6	15 237:17
283:4	238:24	265:14	146:14	progress
287:23	285:23	previously	150:2	49:10
powders	preparing	16:6, 7	165:12	proliferate
5:17 215:4	130:3	43:10	216:18	223:18
Practical	178:10	72:12 76:8	237:21	proliferation
5:14 206:21	presence	81:22	274:17	221:18
practice	64:23 65:8	83:18	problem	227:21
95:5 276:13	Present	100:20	185:1	228:12
	6:13, 16, 19,	108:13	242:20	247:19, 21
PRACTICES	22 7:1, 4, 6	133:9	procedure	253:16
1:5 26:3	140:22	136:17	242:4	284:14
predict	141:20	147:10	proceed	prominent
223:8, 12	152:11	267:14	21:18	217:21, 23
predictions	238:12	primarily	process	proof
96:1	266:23	221:19	141:8	146:16
predisposed	267:8	primary	248:17	proper
101:6	268:5, 15	6:2 228:6	processes	162:22
prefer	269:2, 12, 23	236:15	157:12	180:8, 14
101:22, 24				

195:18, 20	115:15	PubMed	243:15, 21	181:15
282:2	120:23	67:5, 13	255:2	186:1, 2
properly	121:5, 18	pull 151:9	274:10	194:20
273:19	122:7, 21	238:4	280:4	196:11
propounded	196:19	244:11	putting	203:15
293:9	220:15	278:22	95:23	207:22
prospective	232:15	279:9	106:17	209:2, 9
146:22	233:7 248:4	286:13	149:1	212:5
169:8	provider	pulled	156:20, 21	217:5
protected	38:11	122:17	212:8	226:18
62:1	providing	245:8	260:23	247:12
protective	20:5 78:2	pulling	< Q >	258:7, 17, 22
160:4 204:2	Public 1:21	116:21	qualified	262:13
protects	7:10 280:6,	123:10	182:17	278:7
157:23	12 281:4	purpose	qualitative	282:3 284:5
prove	286:21	12:4 124:12	133:1	questioning
146:12, 13,	290:6, 21	purposes	quantify	237:13
24 147:24	293:23	11:20	132:19	274:9
148:23	publication	20:17	133:1, 4	282:17
149:1	49:22	24:21	quantifying	questions
provide	80:19	30:18	133:22	17:17
15:2 16:24	119:1	66:17 67:3	quantitative	23:14 44:1
24:3	219:12	68:23	133:2	55:12, 15
130:20	286:16	70:18	query	86:17
131:19	publications	126:14	250:10	89:20, 22
137:7	49:1, 5, 15	136:16	Question	179:11
239:4, 17	89:3	159:9	8:13 20:19	190:23
243:3	118:17	160:12	34:12 35:1,	233:20
245:13	119:2	183:17	19 36:1, 4	234:4, 7, 24
provided	198:16	200:1	40:21	235:22
11:23 16:5,	publish	205:12	50:11 62:4,	238:7, 24
11 17:3	118:23	pursue	12, 13 65:1	239:3, 11
19:15, 19	196:17	241:21	66:2 68:16	240:15
20:7, 8	248:24	273:18	70:3 74:7	243:8
33:9 44:3,	published	put 15:24	82:1 86:14	245:16
11 48:4	32:21	79:8 93:1,	93:10, 17	274:16
53:5 78:7	59:22 76:1	19 178:18	99:6	275:7
80:9	79:4 88:21	185:22	111:13, 16	276:22
104:11	200:21	190:3, 6	133:14, 17,	284:1
106:12	232:3	199:19	20 134:13	285:4
107:16, 23	249:16	233:11	135:20	288:21
108:7, 14, 15	publishing	238:1, 2	159:23, 24	293:8
109:5, 12, 18	232:6	240:6	170:10, 24	quick
111:8		241:2, 5		233:22

quickly 74:1 123:18 277:6 quite 95:8 quote 91:15, 19 98:8 146:8 182:14 < R > raised 12:9 range 92:2 200:13 205:6 rare 230:9 rate 106:5 186:12 ratio 155:3 173:16 174:5, 17 175:3 186:13 201:23 202:9 203:3, 21 205:5 209:7 ratios 150:9 155:9 157:17 171:7 185:15 186:9 187:7 256:14 raw 207:15, 19 208:1 reach 15:5 24:10 137:17 138:7 275:17 reached	57:16 265:3 react 222:6 reaction 217:9 reactive 217:14 218:2, 12, 18 219:18 284:21 read 75:6, 9, 10, 14 76:8 146:6 181:10 194:5, 6 215:13 225:15 233:3 244:20 249:19, 20 291:3 293:5 reader 156:12 190:7 reading 144:18 174:14 189:10, 16 190:22 204:20 262:11 264:19 276:14 reads 250:14 ready 22:13 96:9 241:20 real 233:22 really 41:6 54:20 59:17 61:9 73:22 79:10 81:13 82:2 108:5	249:8 261:17, 18 reason 55:17 149:20 245:5 291:5 reasonable 243:18 247:23 reasons 249:21 Rebecca 193:13 283:2 recall 30:2, 15 32:3 33:5, 6 34:1 37:23 40:24 45:7 46:15 49:23 51:9 53:17 54:1 57:5 58:2, 4, 19, 20 59:9, 14 60:22 62:24 65:21 67:19 70:2 72:20 78:17 92:8, 9, 23 93:3, 13, 15, 21 95:8 100:6, 24 104:18 105:4 110:2 111:19 114:17 139:19 151:19, 23 166:16 168:22 193:11	207:4 211:5 259:15 282:3, 6, 10, 14 288:19 receipt 291:17 receive 21:4 29:22 33:7 163:12 received 21:8 30:4, 10 105:17 164:5 190:9, 19 281:17 receiving 30:9 33:10 195:21 recess 43:19 115:10 192:5 246:2 274:22 recognize 73:24 recollection 52:7 53:7 59:16 85:8 100:23 217:20 recommend 56:14 recommende d 100:19 recommends 60:4 252:20 253:1 reconcile 200:24 record 9:11 12:10 13:9	15:1 16:1, 16 21:20 43:11, 14, 16, 22 115:9, 13 124:12 126:4 136:16 147:12 192:2, 8 194:16 233:22 234:3, 9 240:17, 18, 19, 21 241:1, 2 244:8, 9 245:3, 18, 19, 23 246:5 272:19, 21 273:1, 2, 7, 22 274:11 275:1 289:1, 4 recorded 131:8 records 85:11, 19, 24 86:3, 9, 21 91:20, 21 92:4 96:24 106:17 130:16, 17, 20, 23 131:2, 9, 15, 17, 19 132:3, 6, 10, 12, 14 record's 73:8 recruited 137:3, 6 Recruiting 137:13 recur 94:6 98:13
--	--	---	---	--

recurred	83:20	75:4	reject	187:8
95:17	192:11	105:16	155:17	201:20
recurrence	211:2	117:11	170:5, 15	261:20
91:8 92:21	referencing	121:9	171:24	290:14, 15
94:9, 16	31:5 225:9,	129:17	rejected	relevance
98:6	13	130:9, 15, 17	230:16	229:13
redactions	referred	145:24	249:1, 6	relevant
126:6	49:2, 6	155:7	rejecting	10:18
reduced	53:9, 20, 23	157:16	230:20	249:22
160:4	268:22	173:12	related	276:14
reduces	270:22, 24	186:18	70:13	reliable
157:23	referring	216:13	77:15	147:7
refer 15:17	80:15	218:11	102:4	reliance
26:14	164:22	265:11	131:12	81:16
128:15	165:6	266:10	132:16	relied 147:1
273:16	166:1	273:12	172:23	rely 30:17
reference	255:23	277:15	190:10	32:2 86:11,
19:23 20:1	275:11	279:24	217:16	23 118:13
50:16 53:6	refers 127:1	281:15, 18	220:16	205:10, 11
67:13, 15	129:2	285:19	281:18	220:7 227:7
72:5 81:2,	161:22	287:4	283:21	relying
3 82:3	182:6	regarding	relates	159:11, 21
120:10	221:23	44:18	16:20	160:8
128:12	reflect	51:21	22:11 31:8	remain 21:8
139:14	117:10	95:19	123:19	remember
180:5, 9	refuse	98:16	133:21	30:1 41:13,
205:21	243:21, 22	189:14	159:10	17 45:14, 16
211:10	regard	276:4	168:4	51:6 59:1,
212:18	13:24 14:5	282:12, 22	170:4, 13	8 60:16
226:20	16:1, 19	Regardless	210:6	64:3 67:16
263:13	22:10	187:19	219:1	68:8
264:3	23:21	207:24	249:13	112:21
272:13	28:11	register	relation	113:4
referenced	31:19	212:19	20:3 22:19	114:21
14:14 19:5,	34:14	213:4	30:9 63:6	118:21
18 76:10	42:12	Registered	84:19	194:8
78:3 80:23	45:18	1:20 290:5,	281:24	207:19
82:8 86:1	46:13	19	283:20	215:12
96:24	54:15	regular	relationship	221:11
121:2	57:17	137:3	135:14	258:3 287:6
122:10	58:10	regulatory	relative	Remote
references	63:13	47:24 48:5	150:10	1:13 9:7
32:1 36:13	72:11	57:15 213:7	173:15	remotely
49:10	74:16, 22		184:21	9:4, 6 290:8

reoccurrence	123:14, 24	275:24	23:4, 21	82:13
92:14, 19	124:15, 20	276:4, 8, 24	26:6 28:3,	121:4 280:7
93:2 94:3,	125:7, 14, 18,	277:1, 6, 9,	9, 11, 15, 21	representatio
24 97:15, 20,	21, 23	10, 23	29:5, 17, 18,	ns 35:16
22 98:1	126:20, 24	278:20	23 30:13, 18,	
repeat	127:9, 15	279:1, 6	20 31:6, 12,	Representing
86:17	128:1, 7, 19	283:12	20, 23 32:4,	2:7, 11, 16,
181:21	129:2, 4	285:21	13, 15 33:4,	20 231:21
196:11	130:6	286:1, 11, 14,	11, 12, 14, 17	represents
273:15	131:24	18, 20	34:2, 3, 15	10:16
repeating	135:13	reported	36:9 37:1	246:24
65:1	136:8, 9, 11,	41:1 146:7	58:12	Request 8:8
134:13	16 139:9, 14	147:11	63:19, 22, 24	18:4 33:3
170:9	144:12	149:6, 10	64:11	35:22
Report 3:16	156:2, 6, 13	164:20	65:12	43:10
4:9, 12, 15,	164:10, 19,	174:18	68:15 69:1,	74:24 75:2
18 6:13, 16,	20 166:4, 12	185:15	15 70:19	121:14
19, 22 7:1, 4	167:15	186:9, 13, 18	80:23 85:4,	126:18
17:6, 8, 12,	169:11	187:20	21 86:1	137:21
13 19:6, 8, 9	174:3	197:8	88:16, 20	requested
26:24 28:7,	178:11, 13,	198:8	90:5 91:11	19:2 126:9
13 29:13, 14,	16, 18 180:4,	201:23	104:5	requests
20 30:14, 16	5, 24 192:9,	208:22	122:21	120:20
32:15, 18	10 200:13	209:6	127:22	require
33:1, 16	205:20	258:2, 18	128:23	22:23
35:3 49:21	211:11	259:17	129:7, 18, 21,	required
63:20	213:14	260:6, 9	23 130:2, 4,	18:19 22:3
64:10	215:15	261:19	12 150:11	213:9
65:14, 15	255:10	263:19	157:17	requisite
69:7, 15	256:5	278:13	161:6	23:16
71:3, 8	257:5, 23	Reporter	162:1	re-reviewed
72:3, 9, 14,	258:23	1:20, 21	188:21	85:7
24 73:11	259:3	9:2 15:3	189:6	research
77:20 78:4	260:13	24:19	201:18	66:12, 16
81:17 84:1	261:2, 11, 23	290:6, 20	220:8	67:2, 10, 22
87:2, 6, 8	262:4, 15	reporting	226:11	68:5
89:17 92:4	264:4, 5, 7	9:7 41:6, 9,	231:3	219:12
97:1 104:6	266:17, 22	21 161:15	260:15	231:19
105:1	267:2, 8, 24	213:9	273:13, 24	264:8, 12
106:19	268:5, 11, 15,	reports	274:1, 3	reserve
107:15	21 269:2, 8,	11:13 19:4,	275:11	23:13, 16
115:17	12, 18, 23	16, 20 20:1,	represent	residency
122:7	270:23	2, 20 21:13	25:23 36:8	44:22 45:6,
	271:1, 3, 19	22:4, 12		8, 15

residents 44:24 45:11, 20 46:22	responsibility 46:18	retested 100:21 103:14	15, 20 86:3, 9, 21 89:11 91:4 96:20	71:15 73:7 89:14, 15, 16 90:9 96:18
resolution 24:10	responsive 121:12 254:19	retreading 81:24	104:4, 21 105:1 120:15, 20 130:18	123:5 131:23 143:20 161:13
resolve 21:22	restart 61:15	retrospective 169:10	131:9, 15, 17 132:11, 12 188:20	162:15 184:6 203:18
resolved 18:13	restate 151:5	return 291:15	263:24	223:4
resources 66:21, 24 67:8	restating 203:15	Review 3:19 5:8 24:5 30:8 38:1 49:21 74:9 76:14 78:12, 15 79:4 80:5, 12, 18 91:20 150:18 151:3, 6 191:3, 7 192:22 211:7, 14, 23 232:19 233:4 239:24 241:9 242:6, 7 244:7, 14 248:13, 17 265:15 276:6, 7	Reviewer 6:5, 9 232:5 236:20 237:4 247:24 248:16 251:11 252:19 253:1, 18	230:5 259:15 271:6 274:21 279:23 280:21 285:6, 12
respect 264:22	result 141:22 145:17 197:21 227:20 263:9			Risk 4:18, 24 7:11 51:4 55:13 56:11 57:24 68:1 77:16 94:8 135:24 141:4, 6, 9, 18 142:1, 3, 4, 13, 23 143:7 144:7, 14 145:6 149:21 152:9 154:3 155:14 156:8 157:1, 13, 24 160:5 167:7 169:13 170:1, 6, 17 172:23 173:16, 22 175:5
respected 141:2 156:23	results 75:10 140:17 143:19 145:3 149:7, 12 160:3 174:1 180:20, 21 181:11, 18 183:9 198:7 200:12 201:1, 12 205:1 208:2, 16 226:1, 14 228:20 230:13 253:7, 14 261:14 262:3, 8, 10, 12, 14, 21 263:6		reviewers 232:18 233:6 249:7	
respiratory 131:5 132:7		reviewed 17:16 19:21, 24 20:16, 21 28:4, 5, 24 33:11, 14, 15 37:9, 16, 19 63:18, 23 64:16 68:10, 20 69:23 70:1, 5, 8 85:4, 10,	reviewer's 248:13 251:1	
respond 35:19, 24 235:21 243:8			reviewing 30:13 78:14 135:16 265:1	
responded 12:23 13:2			reviews 204:15	
Responding 13:21 289:8			revise 165:16 247:5, 6	
response 14:1, 23 16:24 22:16 59:14 141:11 142:21 215:24 217:16 219:9 225:23 228:13 236:1 254:19			revisions 129:13	
responses 254:3, 10			RICHARD 2:13 9:21 10:4 right 24:11 27:13 35:7	

176:9	231:13	262:22	123:12	section
183:14	232:4, 15	263:4	125:21	78:11
184:21	SAED_SEPT	says 12:14	126:22	136:22
185:15	222021 6:6,	143:6	233:13	144:1, 3, 5
186:21	7, 10, 11	153:12, 13	234:15	152:15
187:8	236:21	154:1	235:6	161:14
201:20	SAED_SEPT	174:7	236:4	164:10
204:16	222021_SUP	184:24	237:21	174:2
205:4	PL_000069	191:2	239:23	180:21
208:21	251:12	196:16	280:24	189:7
209:5	SAED_SEPT	203:24	281:1	191:2
210:8	222021_SUP	250:1	scroll 72:3	195:24
213:12	PL_000104	251:22	80:21	200:5, 12
224:7	236:23	252:8, 22	126:4, 23	201:1, 2
261:20	SAED_SEPT	254:12	128:11	204:14
262:5, 16	222021-	262:20	237:7	237:8, 9
265:17	SUPPL_0000	263:4	scrolled	246:16
280:13	70 251:13	281:6, 16	109:4	249:24
risks 150:10	Saed's	283:1	Scrolling	251:20
role 219:6	231:18	schedule	73:18	255:11, 14
room 27:19,	237:5	138:17, 19	116:15	262:3, 14
20 45:1	248:18	Schneider	123:17	263:12
46:9	safe 208:24	21:21 22:17	127:13	277:2
rough 289:9	SALES 1:5	Scientific	128:17	281:10
routinely	26:3	16:4, 8	281:8	287:5
52:16	saliva 103:6,	48:5 57:12,	searches	see 71:18
Rule 4:8, 11,	11, 12	16 59:20	67:20	73:22
14, 17	sample	60:10	searching	79:19, 20
123:13	103:7	66:15, 20, 22	70:11	80:10, 14
124:14, 20	sarcoma	67:2, 9, 21	Second 4:6	81:5 82:4,
125:12	43:3	68:5 70:24	39:6 80:22	21 83:11, 15
127:7, 14	satisfied	72:15	113:21	93:18
128:5, 19	189:24	219:11, 12	123:13	94:21
136:8	saw 45:3	scope 69:4	124:14, 19	107:8
Rules 22:23	245:9	screen	136:7	109:8, 21, 23,
163:20	saying 13:3	71:13, 19	138:17	24 110:11
ruling 22:8	49:23	72:23	139:9	112:2
Rutledge	121:17	79:17, 19, 21	161:19	115:19, 20
48:8	222:8	106:14, 22	165:7	116:8, 18, 23
	234:2	107:8	166:6	119:23
< S >	243:10, 20	108:22	200:12	120:9, 13
Saed 61:17	254:8	109:17, 22	252:16, 21	123:18
62:15	257:22	115:18, 19,	278:21	124:3
230:22		21 119:24		125:20

127:3	seen 20:21	37:8, 18	131:3, 10, 16	251:4
128:13	54:13	38:4, 6, 14	132:6, 13, 18	290:12
139:15	91:22 97:7	42:23 44:2,	133:4, 11, 23	setting
144:17	113:7	5, 12, 19	134:1, 8, 16	50:20
145:16, 21	237:4	46:24 47:3,	135:4, 21	seven 96:16
152:18	244:18	9, 14, 20	137:7, 20	200:15
154:5	254:2	48:1, 6, 16,	138:13	201:3, 4, 10
157:20	select	22, 24 49:4	139:6	sexism 48:9
160:19	138:14	50:4, 14, 19	165:19	SGO 57:22
161:14, 23	self-reported	51:13, 17, 24	264:10, 14,	share 71:12
162:6	146:10	54:2, 7, 17	24 265:4, 23	79:17
175:20	self-	55:1, 18, 21	271:14	106:14
181:5	reporting	57:2, 9, 13,	272:2	115:17
186:16	147:2, 6	18 58:9	serous	122:22
189:9	send 75:1	59:10, 19	167:21	235:13
190:24	233:14	60:8, 18, 23	168:4, 8	280:23
191:22	234:21	61:13, 16	169:20	shared
199:24	235:13	62:14	171:13, 21	58:10
200:16	238:14	63:23	172:20	74:21, 23
202:2, 10, 13	239:22	64:12, 15, 20	173:4, 8, 14	285:24
203:5	240:12, 13	65:5, 17	174:10, 17	286:19
204:19	244:10, 24	66:3, 14	183:2, 9	288:16
206:4	245:4	67:1, 11, 22	186:9	sharing
212:20	sending	68:3, 11, 20	187:9, 12	123:11
213:18	255:5	69:22 70:8,	228:16	126:22
218:6, 8, 9	sense 185:6	14, 20 72:13	251:24	235:3
219:8, 22, 23	234:19	75:19	252:5	Sharko
226:21	256:11	76:15 85:3,	serve 137:3	10:15 11:7
230:10	sent 12:17	13, 20 86:6,	served 17:6	12:13, 14, 17
233:3, 18	107:18	10, 22 87:11,	121:7, 20	13:11
234:16	sentence	15, 19 88:1,	220:14	Sharko's
235:5, 20	143:6	6, 11, 17	230:23	13:24
236:3, 5, 6	153:12	89:2 91:6	231:16	sheet 291:7,
237:9, 14, 23	165:16	96:2, 22	283:2, 8	9, 12, 15
259:21	202:3	100:3, 18	services	293:12
260:17	250:14	105:18, 24	137:22	she'll 97:22
261:6, 7, 18	252:22	106:4	serving	234:6, 23
262:20	sentences	109:6, 12	194:13	244:11, 24
278:8, 12	250:13	110:10	195:1	245:16
279:19	separately	117:7	set 31:23	Shipp 10:8
281:1, 12	112:21	118:5, 9, 12,	88:16 89:3	SHOOK
283:22	September	18 119:3, 6	110:8	2:16
seeing 56:13	26:8, 18	122:12	173:21	short 274:15
	27:7 36:24	130:19		

show 79:15	shown	signing	245:9	162:18
106:11	241:13	291:10	263:16	172:15
115:14	shows	Similar	smaller	176:21
119:12	167:17	135:20	260:19	180:17
128:11	176:8	219:5	Smith 61:8	182:22
175:5	182:4	265:14	272:1	184:15
179:6, 19	210:12	284:20	Smith-	194:19
180:8, 10	255:18	simply	Bindman	198:10
181:19	257:12	258:17	61:18	201:20
182:2	Shukla	Singh 24:22	62:16 63:2,	203:6, 13
185:6	284:7	43:12	9 193:14, 19,	213:23
186:19	side 237:20	single	20 282:1, 11,	223:22
187:13	sign 272:13	254:16	20 283:2	227:23
196:7	291:8	single-	287:4, 11, 20	278:4
229:12	signature	spaced	Smith-	279:10, 14
233:5	124:6	240:3	Bindman's	sort 66:1
234:12	125:24	site 194:3	195:17	81:23 93:9
247:2	127:19	sitting	social 61:9	158:6
250:14, 17	signed	27:14	271:16	sound
253:24	139:4	69:16	society 48:8,	89:15
257:2	272:15	77:24 78:5	9 60:3, 8, 15	96:18 285:8
263:6	significance	129:12	Soft 250:1	sounds
265:14, 17	155:8, 16	situated	solidified	89:16
284:13	160:6, 9	90:16	39:5	source
showed	significant	six 261:10,	somebody	288:13
144:21	150:12	22	191:19	Sources
217:17	153:8, 23	size 160:6	someone's	16:5, 9
228:4	154:10	226:13	101:11	69:8 72:16
shower	155:12	slightly	Somewhat	space 291:6
104:15	156:3, 11, 14	44:16	76:16 225:1	speak 12:11
showing	157:10	Slomovitz	sorry 32:8	speaking
108:21	159:6, 13	211:5, 18	33:22 34:8	9:8
109:8, 17	169:17	Slomovitz's	35:11	Special
124:24	170:6, 16	211:10	55:19	18:17
135:14	171:22	212:2, 9	70:24	species
147:12	172:13	small	89:10 90:2	217:14
209:12	183:5, 14, 24	169:21	95:12	218:12, 18
210:20	187:2, 5	173:19	106:9	219:5, 14, 19
218:23	201:24	174:13, 21	122:3	284:22
224:6	202:10	175:16	143:14	specific
228:12	significantly	176:23	151:4	12:2 20:2
235:6	187:2	185:4, 22	154:19	28:14 31:4
236:4, 6	256:16	198:19	159:23	33:2 38:18,
		240:7	161:6	21 46:3

55:9, 16	spent 45:20	16:23 17:2	143:12	168:10, 13
61:12 68:8	114:18	60:19	144:5 156:6	232:24
77:1 95:24	spoken 61:4	91:11	statistical	strike 97:13
104:5	62:20 161:2	141:3	155:8, 15	173:24
125:21	stage 95:2,	153:6	160:6, 9	263:23
133:3	4, 7, 10, 11,	169:11	174:22	265:8
225:3	15	181:19	183:4	studied
251:21	staging	204:15	211:19	170:3, 14
267:24	42:15	246:24	261:12	175:7
specifically	staining	291:5	statistically	176:11
30:15 31:5,	254:14	stated 87:2	153:8, 23	215:17
11 32:14	stains 218:3	98:10	154:10	217:10
46:5 51:3,	stand 31:2	140:17	155:9, 12	219:4
7 54:14, 23	32:19	188:5	156:3, 11, 14	224:19
66:16	276:11	211:18	157:9	studies 32:1
67:17, 23	standard	statement	159:13	66:3
69:18 76:4	182:17	13:9 20:4	169:17	132:23
77:12 78:1	188:6, 12	137:2	171:21	135:17
79:15	standing	144:10	172:12	151:23
92:10 98:7	50:7 289:12	145:11	183:5, 14, 18,	168:22
99:17	standpoint	146:18	24 187:5, 18	172:12
100:1	14:15, 17	153:20	256:16	179:5, 24
101:11	92:24	161:5	statistics	180:5, 9
112:22	273:10	176:6	94:8 155:22	200:1
141:5	Star 137:13	246:21	status 38:4	201:8
151:11	start 28:10	248:11	154:4	209:14
158:23	39:10 53:3	249:24	stay 138:24	210:15
167:21	63:17	250:6, 22	steering	214:5, 7
169:23	100:17	252:3, 8	9:19	216:5, 7
171:20	118:15	254:5, 7, 12,	stenographic	223:10
173:17	130:16	22 257:4	ally 290:11	224:5, 15, 23
190:12	184:15	281:11	step 229:12	225:5, 8
193:12	201:21	282:7	steps 46:9	229:5, 14
197:21	252:24	287:19	Stipulations	230:7
256:7	Starting	statements	8:12	252:9
259:12	3:21 90:12	53:11	stop 55:22	277:13
265:20	107:2	59:22	56:2, 8, 14,	283:20
277:4, 7	120:11	60:11, 14	19	284:6, 9, 19
283:24	128:14	246:21	Street 2:4,	study
specifics	starts	253:10	9, 14	139:15, 18,
73:1	252:19	288:23	strengths	21 140:4, 5,
spend 21:2	state 9:10	STATES	146:1, 4, 5	21 143:4, 12,
30:12	10:10 11:2	1:1 95:22	151:9	14 144:13,
	12:22	98:19		21 145:4, 11,

14 146:18	215:10, 13,	189:8	super-	supports
148:12, 14,	17 217:9	232:17	sophisticated	32:23
18 149:5	219:22	249:2, 4	239:19	160:17
150:10, 19,	221:20, 23	Subscribed	supervisors	167:18
24 151:1, 14,	224:19	293:19	41:2	205:15
17 160:19	225:8, 21	subset	SUPPL_0000	207:8 250:7
163:11	226:12, 21	198:19	69 6:11	supposed
166:13, 14,	227:8, 11	260:22	SUPPL_0000	32:9
17 167:1, 14,	228:4	substance	70 6:12	sure 21:21
17 168:11,	231:3	31:24 62:7,	SUPPL_0001	24:17
18, 20 169:2,	241:17	22 218:4	00 6:6	30:22 32:9
8, 10, 12	252:13, 14	229:7	236:22	33:8 51:2,
170:13	253:8, 14	293:11	SUPPL_0001	7 65:3
171:24	256:22	substances	04 6:8	68:18 73:8
172:15	258:1, 13, 24	217:10	Supplementa	74:3, 6
173:1	259:5	283:21	l 7:3 17:12	76:2 81:14
176:9	260:8, 19	284:21	19:8 198:2	82:17 83:7
177:21	263:20, 21	subtypes	201:15	84:11, 21
178:23	265:20, 21	169:18, 20,	202:5	86:18
179:22	276:23	21 170:4, 15	203:10, 20	88:23
181:9, 10, 17,	277:12, 22	184:2	255:24	89:18
22 182:16,	279:24	sufficient	269:12	113:11
24 183:22	study's	163:13	271:1, 3	125:1
188:9	178:14	189:13	275:24	126:15
191:6, 7, 19	subcultured	220:18	supplementa	134:14, 24
192:12, 14	253:23	suggested	ry 256:9	149:22
193:5, 8	subject	253:4	257:1	150:3
194:11, 23	11:8 13:19	277:21	SUPPORT	163:5
195:13	21:6 22:6	suggesting	8:2 27:5	165:23
196:2, 4, 14,	62:17	248:5	30:21	166:21
15, 21, 22	118:8	253:19	31:17	170:11
197:2, 5, 6	151:18	suggestion	168:3	179:16
198:19, 23,	240:5	153:13	205:16	184:5
24 199:2, 3,	243:13	277:23	252:4	190:2
12, 18	288:22	281:23	253:15	194:22
202:20	291:10	282:11, 14	supported	202:5
203:8	subjects	suggests	248:8	203:16, 17
207:2, 5, 7,	47:19	204:15	supporting	225:11, 16
10, 14 208:1,	submit	Suite 2:10,	141:12	230:18
22 209:7, 8,	49:22	14	168:6	237:17
20 211:13,	submitted	summary	227:11	254:6 279:8
14 212:12	48:3	60:20 91:19	228:2	surface
213:18	105:23	SUPERIOR	supportive	227:13, 18
214:2, 13	106:2	1:6	160:15	

surgeries	78:11, 15	242:6	177:23	112:6
42:3, 7, 9, 12, 15, 17, 18, 20	79:4 80:5, 12 192:22	244:19, 21	186:14, 20	114:3, 19
surgery		245:20	187:12	130:9
146:12, 24	< T >	274:14	189:15	132:20
147:19, 22, 24 149:1	table 13:6	289:9	197:6	133:5
surgical	153:24	take-away	202:16	143:9
41:12	154:1, 5, 7	187:6	203:2	156:4, 15, 24
surrogate	157:16	taken 12:4	215:3	157:3
219:10, 14	171:11	43:19	217:21, 23	160:24
223:9, 11, 12, 21, 24	173:1, 7	115:10	218:7, 8	164:6
247:19, 20, 21	175:23	125:2	220:15	168:9
surveillance	178:2, 6, 9	192:5	221:16	169:14
219:20	180:16	246:2	223:2	170:2
survive	182:5	274:22	225:23	176:10
94:15	183:2	290:11	226:6	179:4, 17
Susan	184:19, 20	talc 5:15	227:20	190:10, 17, 19 192:20
10:14	186:5, 6	46:13	230:8	193:15
107:18, 19, 24	196:9	50:16 51:1	248:6	195:18
Swan's	198:2, 8	55:15	261:20, 21	199:21
111:9	199:24	57:17, 24	265:18	200:14
swear 25:7	201:15	58:11 59:5, 22 60:1, 12, 19 66:5	281:18	208:17
switch 136:6	202:5	130:21	283:21	209:12, 23
sworn 9:5	203:1, 8, 10, 11, 21	131:20	284:16, 17, 20	210:7, 16
25:11	255:24	134:10, 18	TALC-BASED	213:10
290:8	256:10	139:10	1:11	214:7, 11
293:19	257:1	141:3, 10, 17, 20, 23	TALCUM	216:22, 24
symptoms	263:8	142:22	1:4 5:6, 24	219:2, 8, 17
46:8	288:10	143:9	26:2 37:17	221:16
148:21	Tables 3:19	144:21	47:10 49:2, 11 50:8	228:5
149:3, 18	78:12, 16	145:5, 11	51:21, 24	236:13
synergistic	80:5, 13, 19	152:4, 10	52:21	247:1
144:16, 23	take 16:12	153:15	53:12, 21	252:10
145:13	18:8 24:13	154:7	54:5, 10, 18	253:2
152:4	25:4 34:22	155:3	55:2, 23	266:2, 4
system	35:21	156:9	56:2, 11, 17, 19 61:3, 10, 14, 19 63:14	283:4
219:18	36:11	157:16, 18, 23 159:19	64:1, 17, 22	287:22
250:3	49:20	160:11, 16	65:7, 19	talk 31:16
Systematic	54:21	162:21	68:1	46:5 48:7
3:19 5:8	67:14	167:18	110:22	53:2 59:18
	75:22 83:1	170:17		61:10
	90:15			77:22
	138:2			142:7
				167:2

192:13	152:19	testifying	Texas-	think 16:14
194:2	163:4	27:10 58:2,	licensed	22:20
214:21	176:4	19, 20 92:24	272:8	32:23 36:8
258:5	189:3	93:13	Thank	40:5 48:18
263:11	225:18	127:23	36:15	50:24 62:6
talked	248:22	162:20	71:20 73:3,	65:2 69:7
60:24	telling 120:3	193:23	12 79:13	74:6 75:3,
61:13, 17	temporarily	testimonies	83:13 85:9	12 77:2, 7
69:13	24:21	37:3	90:3	83:4 98:19
70:17	ten 91:1	Testimony	113:14	116:20
150:15	94:6, 9, 15	3:5 22:11	119:5	135:12
168:21	95:1, 16	31:20, 24	120:7	137:14
187:7	114:24	37:5, 10, 12,	121:21	140:8, 24
255:15	192:1	17, 22 48:4	122:19	143:17
271:11	tenens	64:17	123:20	146:3
273:15	38:11	66:17 67:3,	126:18	150:21
talking	137:13	10 81:3, 4	139:1	158:7
20:10 28:9,	terms 73:6	83:16 85:5	142:6	160:14
12 31:2, 12	76:22	93:3, 7	143:11	163:17
34:15 68:6	173:15	104:3	171:4	165:5, 12
76:21, 24	183:15	122:9, 10, 15	197:19	168:12, 20
102:18	199:5	150:22	214:18	174:11
145:19	test 100:16	162:2	241:2	179:18
158:11	101:19, 21	164:6	255:4	180:13
159:17	102:19, 22	176:7	271:7	185:12
170:20, 22	103:1, 4, 23	194:6	274:20	186:1
188:7	154:9	220:15	279:21	188:22
192:8	183:4	263:2	285:4	190:6
242:4	250:3	290:11	288:20	194:9
244:16	256:13	testing	289:2	209:2, 9
teaching	tested 101:3,	64:22 65:7,	Thanks	212:24
44:17, 24	13, 17	19, 23 77:10	23:19	213:1
46:17	103:21	100:6, 14, 16,	24:23 83:10	215:16
technically	testified	20 102:8, 12,	therapy	218:5, 16, 20
13:14	25:12	22 103:9	153:16	234:17
TECHNOLO	26:17	276:6	thing 22:16	235:2, 12
GIES 1:23	49:20	tests 100:10,	234:16	238:10
Tecum 4:6	57:21	22 102:16	things	239:6
119:19	58:16 283:9	250:16	99:12	240:11
Ted 10:9	testify	254:8	104:9	243:24
tell 25:19	130:11	Texas 1:19	141:15, 24	244:3
56:8, 18	276:15	27:11	158:24	247:11, 23
83:6	290:8		179:3 230:8	248:12
140:18				249:14

258:10	189:20	83:1 84:17	20:24	242:24
259:11	258:22	90:15	23:15 26:1,	tracts 198:5
264:6	thousand	100:24	5, 13, 22	training
273:22	179:15	105:11	27:3, 10, 23	117:12
285:6	thousands	109:7	29:10 30:3	118:8
288:14	103:24	113:1	36:20	transcript
thinking	238:21	114:10	37:10 63:6	15:8
37:23 41:4	Three 3:23	115:6	68:4, 11, 21	290:10
225:13	18:22 19:4,	131:23	69:17	291:17, 19
thinks	12, 17 20:10	138:18	70:17, 23	
101:18	21:12 22:4,	179:10, 20	78:1, 5	transcription
Third 7:3	12 28:15, 16	180:19	103:4, 12, 14	293:7
17:11 19:7	29:12, 17	212:6	104:3	Transcripto
65:14	31:6, 12, 14,	215:14	120:11	mic 5:19
113:23	18, 20 34:14	231:19	129:13	221:2
152:15	38:13 69:9,	244:1, 12, 14	130:10	transformati
166:6	13 78:7	245:2, 15	162:18	on 6:1
205:20	80:10 89:5	254:16	266:12	228:6, 24
263:17	107:17	271:21	273:4	229:6
269:11	108:8	272:3, 8, 17	today's	236:14
270:24	109:18	273:5, 18	15:17	247:22
271:3	110:15	274:2, 4	20:17 22:4	250:4, 8, 10,
275:23	113:19	290:11	104:12, 21	15 253:5, 15
thirdly	114:11	times 52:9	105:13	transformed
141:18	123:1	200:8, 15	136:18	250:17
thirty	127:22	201:7, 9, 10	142:9	253:22
291:16	128:23	202:23	192:15	transparent
Thirty-four	133:21	261:10, 22	206:15	52:24
3:19 107:1	134:2	timing	214:23	treat 46:7
THOMPSON	141:15	273:11	told 12:10	treated
N 2:4 9:15,	165:18	274:12	54:3	173:22
16 27:15, 21	218:3	titanium	146:15	treating
83:9, 24	273:13, 24	218:5	147:20	42:22 44:2
84:6, 14	278:15	223:2	288:14	46:20, 22
105:9 272:1	time 12:8	225:22	ton 73:6	96:21 147:5
Thompson's	17:6 20:24	226:4, 9	top 116:9	treatment
27:16	21:3 23:13,	title 228:3,	117:20	44:10, 14
thought	16, 17 24:1	18 250:11	123:17	253:24
37:13 97:5	30:12 38:9	titled 228:8	137:14	254:17, 19
101:15	39:2 44:8	229:9	topic 47:24	treatments
146:23	45:18, 19, 24	titles 46:16	totality	254:3, 10
154:22	46:2, 5	today 10:18	240:1	Trenton
172:19, 22	55:5, 6, 16	11:4 15:18	241:10	10:8
173:20	68:17 74:5	17:18 18:2		

trial 146:22	164:9	260:20	Understood	156:4, 9, 15
193:24	166:3	278:15	62:3	157:1, 16, 18
194:3, 7	188:24	285:10, 13	111:15	159:11, 19
195:2, 14	205:19	two-minute	236:8	167:6, 19
tried 235:9	213:13	272:15	260:23	168:9
true 176:20	220:11, 21	Tylenol	undertaken	169:15
217:18	226:19	179:14	253:2	170:2
224:18	251:3	type 44:10	unfair	176:10
275:22	252:16	47:8, 16	240:11	177:23
283:14	255:9	89:4 95:2	242:1	178:2, 3, 4, 6
287:20	277:1, 5	134:9, 17	UNITED	179:4
truth 290:8,	281:21	135:21	1:1 95:22	181:2, 3
9	283:12	167:23	98:19	182:6, 9
try 21:21	turned	228:16	unnecessary	183:7
133:4	137:21	264:21	83:2	185:17
143:22	Turning	typed 119:8	unpublished	186:5, 12, 19,
198:1	96:6 276:24	types 42:11,	196:23	20, 24 187:1,
231:5	two 10:22	21 43:2	197:1, 3	12, 22 188:2,
235:2	29:18	45:2 142:5	199:12	6 192:20
238:20	30:16	173:9	update	196:3, 14
274:18	38:13 40:4	174:9 219:4	117:1	197:8
trying 64:2	61:11	typos	updated	199:20
97:6	63:19	129:10	20:5 93:11	200:3, 10, 14
111:12	69:14 77:6		116:17	210:7
149:22	86:4	< U >	167:17	219:13
260:2	100:13	ultimate	Use 4:22	237:19
tube 252:1,	106:18	284:4	5:6 7:10	261:6, 20
6, 11, 14	112:10, 14	ultimately	15:10	262:6, 17, 24
tubes	117:18	22:7 222:24	44:15	265:18
197:10, 24	141:24	uncommon	49:11 50:9	266:4
198:4, 14	145:20	95:8, 10	51:21 52:1	274:2
199:13, 22	155:9, 13	understand	53:12, 22	280:13
201:19, 23	157:11	14:2 25:1	54:5, 10, 18	users
202:6, 8	158:24	26:10, 19	55:3 56:18	158:19
tumor	161:17	111:12	59:22 60:2,	160:3, 11
250:18	164:19	240:10	12 61:3, 14	170:17, 18
tumors	180:23	254:7	63:15	202:1, 12, 16,
172:19	187:4	267:13	64:18	22 203:2, 22
173:20	200:7	271:4 274:6	130:9, 21	204:3
turn 136:21	201:2, 5, 7, 9	understandin	131:20	256:1, 2, 8,
138:8	202:23	g 12:6	143:9	10, 11, 15
139:8	214:4, 6	14:10	152:11	257:8, 9, 18,
143:24	230:8	74:13	153:15	19 259:23
153:23	245:20	258:21	155:3	

260:7	visit 91:22	270:3	121:7	146:7
263:18	272:15	277:3, 7	182:7, 8	149:16
usually	visits 91:5	279:8 280:1	183:6, 7, 11,	151:8
54:23	96:21	wanted	13, 23	165:22
94:20	Vitae 4:1	37:24	184:14, 22,	173:23, 24
98:11	115:23	wants 92:7	23 185:18	184:7
103:23	116:3, 12	99:12, 24	187:1	200:23
137:24	117:2, 8, 24	Washington	200:8, 15	201:4
uterine	vitro 250:2	2:10	201:3, 7, 9,	208:11, 23
42:24 43:2	283:19	water 29:15	10 202:23	209:2
	vivo 229:14	way 31:1	261:9, 10, 21,	219:11
< V >	volume	51:18	23	223:14
vagina 43:6	133:5	67:18 79:8	weekly	227:1, 2
vaginal	voluntarily	87:19 89:1	137:16	232:13
42:17 43:5	45:5	94:1 99:10	weeks	233:5
valid 202:14	vulva 43:7	143:22	38:13 39:2	235:1, 9, 23
value	vulvar	148:8, 22	40:4, 11, 16,	238:16
157:11	42:17 43:4	190:18	20, 22	242:3
various	< W >	216:2	weighing	244:3, 10, 15,
277:2	waiting	219:7	232:24	23 247:8
vast 101:5	21:17	229:10	weight	256:4
248:24	want 15:24	233:16	185:23	257:16
verbatim	16:22	241:15, 24	249:12	271:17
290:10	21:24 24:7	247:9	Weinberg	284:8 289:9
version	36:6 59:17	262:22	250:20, 24	well-
234:13	70:22 73:7	weak	welcome	established
265:1	82:24 83:1	148:18	255:7	141:4
280:6	87:4 115:2,	211:20	well 14:2	142:23
281:5	3, 14 129:14	212:11	17:10 19:1	143:7
286:22	136:6	weakness	22:15 24:8	144:7
versus	138:1, 2	148:12	26:20, 24	156:23
94:10	233:17	150:16, 24	28:14	well-known
156:10	234:10, 20	weaknesses	36:14 53:3	140:13
158:19	239:3	146:2	56:4 59:2	went
178:2, 3	240:6	150:19	74:14	128:24
182:7	241:21	151:7, 9	91:13, 24	129:8
209:23	243:2	168:11, 17	92:12	208:15
217:22	246:7	232:24	95:20	We're 18:8
256:11	258:5	Weatherby	111:14	20:9 22:3
videos 47:18	266:12, 17	137:12	134:23	24:9 25:24
view 265:22	267:3, 16, 17,	website	137:11	26:5 31:21
views 58:17,	22 268:9, 19	57:23	140:15	34:15
23	269:5, 16	week 40:14	141:2, 9	35:20 43:9,
		41:16	145:2	21 73:24

81:14 85:6	witness	151:22	217:3	17:3, 16
106:22	1:18 6:14,	152:8, 21	222:17	19:21
109:14	17, 20, 23	153:3, 11	224:10, 14,	20:12, 19
112:17	7:2, 4, 6	154:23	22 225:12	21:11, 17
117:9	8:5 9:5	155:21	226:3	23:11 24:1
120:16	32:7 33:22	156:19	227:4	25:8, 10, 17,
128:13, 18	34:7 35:8	158:4, 13, 22	229:17	21, 22 27:9
180:18	52:20	159:16, 21	231:9, 15	34:5, 11, 24
184:7	53:16 57:4	163:3, 16, 24	232:10	35:14, 17, 23
185:7	60:1 62:23	165:5, 10, 22	243:16	36:19
194:11, 23	64:8, 16	167:13	247:13, 17	43:24
203:7, 18	65:11 69:5	171:5	248:21	62:22 71:9,
214:17	71:14, 20	172:7	251:18	19 73:16
234:2, 22	75:23 77:6	175:12	253:13	77:5 79:11,
242:12, 18	79:20	176:15	255:4, 22	19 81:6
244:5, 7	80:16 82:6	177:11	256:20	82:5 104:2
272:24	87:7 89:10	179:2	257:6, 16	106:11
274:12	90:4, 9, 17	180:13	258:20	107:2, 7, 18
280:3 289:1	91:21	181:14	259:11, 20	109:5, 22
We've 23:1	93:20	182:13	261:5, 16	110:15
24:18 43:9	96:13 97:5	184:10	263:3	111:15
68:5 69:9	98:4 99:16	189:14	264:18	114:1
70:16	102:23	190:10	266:8, 15, 23	115:2, 14
111:7	103:18	191:17	267:9	116:4, 9
113:7	104:14	192:4	268:6, 16	119:18, 23
114:23	106:16	193:14	269:2, 13, 24	120:10
191:24	115:5, 20	194:13, 19	278:8, 19	122:8
274:10	116:23	195:5	279:15	123:4, 10
white	120:1	196:7	281:2	124:3, 6, 21
167:20	121:23	197:13, 20	282:6, 24	125:14, 19
187:23	122:5, 24	198:22	283:3	127:3, 9
who've	123:5, 22	199:16	287:14, 16,	128:7
56:10	127:4	200:19	22 288:6	131:22
willing	132:1	202:19	289:2, 13	142:21
94:21	133:12	204:6	290:7 291:1	144:1
98:12	134:6, 23	205:3	WOLF	146:18
242:13	135:11	206:3, 11	1:18 3:5,	164:10
Wisconsin	136:4, 13	207:18	16, 21, 23	166:3, 24
39:4 40:13	140:1, 8	208:11	4:3, 5, 9, 12,	174:2
wish 23:11	145:2, 16	209:19	15, 18 6:13,	212:1
withdraw	147:16	210:11	16, 19, 22	214:16
36:4 62:12	148:7	212:15	7:8 11:4	233:17
207:22	149:16	213:22	12:18	237:13, 22
212:5	150:23	214:1, 17	14:18 16:4	238:3, 23

240:13	Wolf-22	146:14	260:2, 9, 19	281:17
241:7	6:18 268:4	148:19	263:11, 20	282:13, 22
242:1, 16	Wolf-23	153:17	265:19	worked
244:12	6:21 268:14	167:8, 20	281:21, 22	38:15
245:1, 14	Wolf-24	168:9, 15	286:4 287:2	39:22, 24
266:23	6:24 269:1	169:13	word 190:5	40:2, 9, 11
267:8, 19	Wolf-25 7:3	170:3, 14	207:19	41:15
268:5, 15	269:11	171:2, 6	208:1	54:16
269:18	Wolf-26 7:4	173:3	wording	117:16
270:6, 11, 18	269:23	174:4	143:3	138:13, 18
273:19	Wolf-27 7:6	175:2, 7	words	216:7
274:17	270:10	183:3, 12	110:24	working
275:6	Wolf-28	184:3, 18	145:17, 21	38:8, 10, 24
280:8, 24	7:10 280:12	185:16, 17	163:18	39:3, 7, 12
293:16	Wolf-3 3:19	186:11, 14	164:8	40:7 41:5,
Wolf-1 3:12	107:1	187:10, 11,	169:7	23 44:20, 23
71:6	Wolf-4 3:23	22, 23 197:9,	217:11	114:18
Wolf-10	110:15	23 198:3, 13	261:6, 13	118:21
4:15 128:5	Wolf-5 4:1	199:13, 20	263:9	138:1, 3
Wolf-11	116:3	201:19, 22	work 38:18	208:3
4:18 142:13	Wolf-6 4:3	202:6, 7, 15	39:5, 15, 20	214:18
Wolf-12	119:17	203:1, 21	40:6, 17, 22	244:1
4:22 167:6	Wolf-7 4:6	208:3, 17	44:4 47:4	271:18
Wolf-13 5:5	124:19	209:12, 14,	62:1 64:21	works 49:9
192:19	Wolf-8 4:9	22 210:6	65:6, 18	162:14
Wolf-14 5:9	125:12	216:22	70:16, 18	world
206:18	Wolf-9 4:12	219:1	105:17	219:12, 13
Wolf-15	127:7	224:24	106:6	worth
5:15 215:3	Wolf's	261:19	108:11	148:24
Wolf-16	22:11	265:18	110:21	write 49:21
5:19 221:2	73:11 79:5	280:15	112:4	57:22
Wolf-17	81:15	wonder	114:2, 14	writes
5:24 236:13	108:10	237:19	119:8	220:13
Wolf-18 6:5	124:14	Woolen 5:9	134:1	writing
236:20	150:21	77:21	137:10	191:4
Wolf-19 6:9	239:23	105:2	138:1, 2, 4, 6,	written
251:10	267:24	165:23	20 189:8, 15	58:11
Wolf-2 3:16	268:11	166:9	190:10	140:16
80:3	women	192:12, 14,	194:24	150:3 191:8
Wolf-20	4:20 5:2	23 197:16	210:23	wrote 12:18
6:13 266:22	7:13 86:4	255:14, 17,	253:1	141:16
Wolf-21	95:21, 23	20 256:5, 6	264:22	146:6
6:15 267:7	98:18	257:2, 22	271:20	174:15, 16
	142:14	259:8		

180:14	Yessian			
	81:2			
< Y >	yesterday			
Yeah 24:23	11:11			
34:7 45:14	19:23 20:7			
59:2 60:21	23:4 63:7,			
64:8 73:9	9 104:7			
75:23	105:7 272:3			
82:18, 20				
84:14 90:4	< Z >			
93:20	Zoom			
104:23	105:10			
125:6	242:12, 18			
143:21				
158:13				
161:17				
166:21				
168:12				
176:2				
195:9				
225:12				
232:3				
235:11				
246:14				
247:13				
286:17				
year 40:17,				
22 75:16				
106:8				
188:11				
years 49:19				
89:14				
90:21, 23				
91:1 94:6,				
9, 10, 11, 15				
95:1, 16				
96:17				
100:13				
122:10, 16				
178:3, 4				
186:12, 15				
187:10, 12				
188:8, 10, 11				
Yep 160:21				